IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

FIRST APPELLATE DISTRICT

DIVISION FOUR

CHURCH OF SCIENTOLOGY, INTERNATIONAL,)
Plaintiff/Respondent,)
)
vs.)
)
GERALD ARMSTRONG,)
Defendant/Appellant.)

NO. A075027

CLERK'S TRANSCRIPT ON APPEAL

FROM A JUDGMENT MADE AND ENTERED

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

MARIN COUNTY COURTS

VOLUME 27

For the Plaintiff/Respondent:

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For the Defendant/Appellant (In Pro Per):

Gerald Armstrong
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

MARIN COUNTY COURTS

DEPARTMENT 1

CHURCH OF SCIENTOLOGY, INTERNATIONAL,)
Plaintiff,)
)
vs.)
)
GERALD ARMSTRONG,)
Defendant.)

No. 157680

GARY W. THOMAS	JUDGE
JOHN P. MONTGOMERY	COURT EXECUTIVE OFFICER
ELAINE PASSARIS	REPORTER

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CHRONOLOGICAL INDEX NO. 157680 VOL. 27 MARIN NO. 157680

EVIDENCE IN SUPPORT OF OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT VOLUME VI 7398

EVIDENCE IN SUPPORT OF OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH, & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT VOLUME VII (INCLUDING EXHIBIT Y) 9/18/95 7505

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FILED
SEP 18 1995
HOWARD HANSON
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by J. Steele, Deputy

Gerald Armstrong
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In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

7398

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. 157 680

EVIDENCE IN SUPPORT OF OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT

Date: 9/29/95
Time: 9:00 a.m.
Dept: One
Trial Date: Not Set

VOLUME VI

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GERALD ARMSTRONG and THE
GERALD ARMSTRONG CORPORATION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. **157 680**

ARMSTRONG'S SUPPLEMENTAL DECLARATION IN OPPOSITION TO SCIENTOLOGY'S MOTION FOR SUMMARY ADJUDICATION OF THE FOURTH, SIXTH AND ELEVENTH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT

Date: 1/27/95
Time: 9:00 a.m.
Dept: One
Trial Date: May 18, 1995

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DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare:

1. I am making this declaration as a supplement to my memorandum and supporting documents filed January 13, 1995 in opposition to Scientology's pending motion for summary adjudication.

2. It was clear to me at the time of the settlement, and has become even clearer with the passage of time and the proliferation of litigation of the issue ever since then that the "settlement agreement's" non-disclosure condition, an aspect of which is the liquidated damages penalty, is impossible and legally unenforceable. Many of the legal reasons, some of which I understood at the time, and some of which developed over the years since December, 1986, my attorney Ford Greene has dealt with in the opposition. I am filing this supplemental declaration because I believe what I have to say herein concerns and underlies all aspects of this litigation and should be said.

3. Beyond and encompassing all reasons, the non-disclosure condition is impossible and legally unenforceable because no agency other than God can enforce it, He has not done so, and nothing He says indicates that He will. It is inarguable that potentially what I have to say, as with everyone else, which Scientology seeks to silence in me and others, are God's words. For that reason, beyond and encompassing the legal defense of that reason, I cannot by Scientology be silenced. There is, I believe, and pursuant to God's Word, a better chance for my words to be His because I ask that they be.

4. Scientology preaches to those who obey its orders, among which number I was counted for many years, that God does not exist, and that what should be sought, studied, sold and bought for salvation, or "survival," is its mental "technology," "auditing." Appended hereto as Exhibit A are two copies of Scientology's "OT III materials," both of which I studied while inside the organization. One is handwritten by L. Ron Hubbard and the other is typed from the handwritten original. They are part of a larger body of writings called the "Upper Level" materials, which are part of the whole body of L. Ron Hubbard's "technical" writings. In the OT III materials, which are a central part of Scientology's "technology," Hubbard states that God is an "implant," (Ex. A at Bates-stamped pages 700681 and 700694) which he defines as "a painful and forceful means of overwhelming a being with artificial purpose or false concepts in a malicious attempt to control and suppress him." This definition is provided in Scientology's "Technical Dictionary," the relevant pages from which are appended hereto as Exhibit B. The concept that God is an "implant" is consistent with everything else I studied and the way of thinking and the way of life ordered and enforced by the organization while I was inside. Anyone who professed a belief in God was, inside Scientology, considered and dealt with as if he or she was "psychotic."

5. Appended hereto as Exhibit C is a declaration executed October 27, 1994 by Michael Rinder, director of plaintiff Scientology organization herein, and filed in the case of Scientology v. Steven Fishman & Uwe Geertz, US District Court for

the Central District of California No. 91-6426-HLH (Tx). Mr. Rinder's declaration concerns "settlement" meetings he and fellow Scientology director Michael Sutter had with former organization executives Vaughn and Stacy Young. Mr. Rinder accuses me of being psychotic because I converse with God. Ex. C, at 11:2-12. After I received the declaration about a month ago I called Mr. Rinder, and during our conversation he confirmed that what he meant was that he considers that I am psychotic because I communicate with God. Declarations by the Youngs providing their statement of their meetings with Rinder and Sutter in response to the Rinder declaration are appended hereto as Exhibits D and E. Stacy's response to Rinder's charge that I am psychotic because I communicate with God is at Ex. E, ¶ 33.

6. Theologically, Scientology, as it is now practiced, is idolatry. Appended hereto as Exhibit F is a page from Webster's Third New International Dictionary of the English Language Unabridged which defines idolatry as: "the giving of absolute religious devotion and ultimate trust to something that is not God." Non-idolatry, that is to say, religion, says, believe in God, seek God, trust God, look to God for understanding, serve God, ask Him for wisdom, courage, and guidance, and do His Will. Scientology says believe L. Ron Hubbard, study his technology, serve the organization, and do its will. Within and under this country's Constitution it is legally ridiculous that anyone free to practice religion could not be adverse to, speak out concerning, nor assist those adverse to, what is adverse to religion - idolatry.

7. Historically, Scientology is the product of the cleverness of a man in opposition to the Will of God. In that it is nothing new under the sun; yet even man's cleverness will be used by God for His Purposes. This has happened with Scientology's clever lawyers' clever "settlement agreement." I have done nothing but be willing to be guided by God as He unweaves the web Scientology's lawyers and leaders have woven, and in which they have, by seeking to ensnare others, ensnared themselves. It is wisdom as ancient as the silliness that gave rise to its need that he who uses fair game becomes fair game. God uses me to free the Scientologists by being free and speaking freely. In that I am a Prophet to Scientology (PtS), for God never stops bringing His Word to everyone, even those who in their cleverness deny His Existence, and surely those they've snared and oppressed.

8. Scientology's creed, a copy of which is appended hereto as Exhibit G, this edition published in 1992 in Scientology's book What is Scientology?, states:

> "We of the Church believe:
>
> That all men of whatever race, color or creed were created with equal rights;
>
> That all men have inalienable rights to their own religious practices and their performance;
>
> That all men have inalienable rights to their own lives;
>
> That all men have inalienable rights to their sanity;
>
> That all men have inalienable rights to their own defense;

> That all men have inalienable rights to conceive, choose, assist or support their own organizations, churches and governments;
>
> That all men have inalienable rights to think freely, to talk freely, to write freely their own opinions and to counter or utter or write upon the opinions of others;
>
> ....
>
> And that no agency less than God has the power to suspend or set aside these rights, overtly or covertly."

The individuals who control Scientology and its litigation seek by the "settlement agreement," by the power of our courts, and by extrajudicial means, to deny me, and others, each of the "inalienable rights" listed above. I do not seek to deny anyone any of those rights. Who then is the Scientologist? Can any court of man's laws prevent me from so practicing this religion or opposing those who suppress it?

9. Plaintiff Scientology organization herein includes this creed as Article IV in its By-Laws, a copy of the relevant pages from which are appended hereto as Exhibit H. These By-Laws were authenticated by Scientology Secretary Lynn Farny at his deposition on July 12, 1994. Scientology's preamble to its creed in its By-Laws states:

> "The Church subscribes, and its object is and purposes are that all Mankind may subscribe to and practice the following Creed:
>
> .... Ex. H, pp. 6-8.

10. One of the most quoted and revered writings of

Scientology is Hubbard Communications Policy Letter of 7 February, 1965 "Keeping Scientology Working," a copy of which is appended hereto as Exhibit I. At page 6 is the statement by L. Ron Hubbard:

> "The whole agonized future of this planet, every Man, Woman and Child on it, and your own destiny for the next endless trillions of years depend on what you do here and now with and in Scientology.
>
> This is a deadly serious activity. And if we miss getting out of the trap now, we may never again have another chance."

This is what every Scientologist is required to believe. Can it be any different for me, and can this country's courts abet those who would suppress Scientologists in preventing me from doing with and in Scientology what is necessary to get them and their trapped adherents out of "the trap?" Both by God's Will and by Scientology's own writings and logic I will speak and act freely.

11. My decision to help Vicki and Richard Aznaran in 1991 (Scientology's fourth cause of action), and David Mayo in 1992 (Scientology's eleventh cause of action), flowed from the same Source as my decision to help Ford Greene in his battle against the suppression of Scientology, and the decision to speak out against suppression if such speaking is God's Will. In a declaration, a copy of which is appended hereto as Exhibit J, which I wrote and executed July 19, 1991 to assist attorney Joseph A. Yanny in a lawsuit by Scientology falsely charging him with representing me in my own Scientology litigation, I stated what I

understood at that time to be our God-given nature to help.

> "But more than a desire to protect myself or right the organization's unjust acts towards me, however, I helped Mr. Yanny for the simple reason that he asked. I will do the same for anyone. The organization is aware of this fact because it received my letter of June 21, 1991....It is not only the right of all men to respond to requests for help, it is our essence. If I was induced, therefore, to help Mr. Yanny, or anyone else, it is our Creator Who induced me.
>
> ....
>
> I know that I am sustained completely by the Great Coordinator Who sends to me whomever He wants me to help. I therefore cannot be induced by money or whatever anyone can offer me." Ex. J, pp.7-9.

God is our help, and He created us in His image. Can we, therefore, be other than help. Appended hereto as Exhibit K is a copy of my letter of June 21, 1991 to Scientology attorney Eric Lieberman referred to above.

12. I am aware that Judge Sohigian's injunction of May 28, 1992 prohibits me from helping a certain special class of people. Scientology has repeatedly tried to have me jailed for contempt for providing what it charged was such "help," so my understanding of the class the Sohigian injunction prohibits me from help is very clear. The order of Los Angeles Superior Court Judge Diane Wayne dated July 28, 1994 discharging all of Scientology's contempts against me is appended hereto as Exhibit L.

Scientology's actual purpose in having me jailed is shown in another "Upper Level" "scripture," Hubbard Communications Office Bulletin October 1, 1969 "Why Thetans Mock Up," a copy of which is appended hereto as Exhibit M. Hubbard writes:

> "Jail denies a thetan (Scientology term for "being") all spaces except where he has been placed and note that thetans are made very miserable in jail. Jailing is a sure way to confirm criminals and also t make them crazy as well." Ex. M at p. 2.

It is indicative of its nature that Scientology sought to have me jailed not for perjury or some other crime, but for speaking the truth and helping my fellows. Thankfully, since Judge Sohigian's order I have not been called upon to help any of the special class which his order prohibits me from helping. Nevertheless, the Sohigian injunction is itself a violation of a higher order, God's Injunction to love each other, and surely to help those oppressed. Rev. Martin Luther King's words, quoted in today's San Francisco Chronicle, are fitting for the instant Scientology battle:

> "Oppressed people cannot remain oppressed forever." Ex N.

If we are jailed for helping the little ones, the oppressed, or even if we are killed by the oppressors, God's Will be done.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Anselmo, California, on January 16, 1995.

GERALD ARMSTRONG

PROOF OF SERVICE

I am employed in the county of Marin, State of California. I am over the age of eighteen years and not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California 94960. I served the foregoing document(s) described as:

> **ARMSTRONG'S SUPPLEMENTAL DECLARATION IN OPPOSITION TO SCIENTOLOGY'S MOTION FOR SUMMARY ADJUDICATION OF THE FOURTH, SIXTH AND ELEVENTH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT; ARMSTRONG'S EVIDENCE IN SUPPORT OF SUPPLEMENTAL DECLARATION**

on the following persons on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Laurie J. Bartilson, Esquire BOWLES & MOXON 6255 Sunset Boulevard, Suite 2000 Los Angeles, CA 90028	MAIL DECLARATION BY FAx
Michael L. Walton, Esquire P.O. Box 751 San Anselmo, CA 94979	MAIL

[X]	(By Mail)	I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.
[ ]	(Personal)	I caused said papers to be personally served on the office of counsel.
[X]	(State)	I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: January 19, 1995

____

Ford Greene
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711 Sir Francis Drake Boulevard
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Attorney for Defendants
GERALD ARMSTRONG and THE
GERALD ARMSTRONG CORPORATION

FILED
JAN 19 1995
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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive, Defendants.	No. 157 680 **ARMSTRONG'S EVIDENCE IN SUPPORT OF SUPPLEMENTAL DECLARATION IN OPPOSITION TO SCIENTOLOGY'S MOTION FOR SUMMARY ADJUDICATION OF THE FOURTH, SIXTH AND ELEVENTH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT** Date: 1/27/95 Time: 9:00 a.m. Dept: One Trial Date: May 18, 1995

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Exhibit A	"Operating Thetan Section III," by L. Ron Hubbard (Handwritten and typed versions)
Exhibit B	Excerpt, Dianetics and Scientology Technical Dictionary, Bridge Publications, 1982
Exhibit C	Declaration of Michael Rinder executed October 27, 1994, and filed in Scientology v. Steven Fishman and Uwe Geertz, US District Court for the Central District of California, No. 91-6426-HLH (Tx)
Exhibit D	Declaration of Robert Vaughn Young, executed December 14, 1994
Exhibit E	Declaration of Stacy Brooks Young, executed December 14, 1994
Exhibit F	Excerpt, Webster's Third New International Dictionary of the English Language Unabridged, Merriam-Webster, Inc., 1981
Exhibit G	"The Creed of the Church of Scientology" published in What is Scientology, Bridge Publication, 1992
Exhibit H	Excerpt, Revised Bylaws of Church of Scientology International, amended April 10, 1994

Exhibit I	Hubbard Communications Office Policy Letter of February 7, 1965, by L. Ron Hubbard, Corrected and Reissued October 12, 1985, "Keeping Scientology Working," published in The Organization Executive Course, an Encyclopedia of Scientology Policy, Basic Staff Volume 0, Bridge Publications, Inc., 1986
Exhibit J	Declaration of Gerald Armstrong executed July 19, 1991
Exhibit K	Letter from Gerald Armstrong to Eric Lieberman, dated June 21, 1991
Exhibit L	Ruling of Judge Diane Wayne filed July 28, 1994 in Scientology v. Armstrong, Los Angeles Superior Court No. BC 052395 (now Marin Superior Court No. 157680)
Exhibit M	Hubbard Communications Office Bulletin of October 1, 1969, by L. Ron Hubbard, "Why Thetans Mock Up"
Exhibit N	Excerpt, article "5 Who Share the Legacy of Rev. King," San Francisco Chronicle, January 16, 1995

OT III MATERIALS REMOVED

DIANETICS AND SCIENTOLOGY
TECHNICAL DICTIONARY

by

L. Ron Hubbard

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ILL, being medically diagnosed as suffering from a known, well defined physical **illness** susceptible to medical care and relief. (HCO PL 6 Oct 58)

ILLUSION, 1. a surface manifestation which disappears when experience is consulted. (SH Spec 70, 6607C21) **2.** a product of the actual. (SH Spec 70, 6607C21) **3.** any idea, space, energy, object or time concept which one creates himself. (*Scn 8-8008* Gloss)

IMAGINARY CAUSE, imagining they do or **cause** things bad or good. (HCOB 1 Nov 68 II)

IMAGINARY VISIO, the scenery **imagination** constructs. (*SOS*, p. 72) See DUB-IN.

IMAGINATION, 1. the recombination of things one has sensed, thought or intellectually computed into existence, which do not necessarily have existence. This is the mind's method of envisioning desirable goals or forecasting futures. (*DMSMH*, p. 14) **2.** the ability to create or forecast a future or to create, change or destroy a present or past. (*Scn 8-8008*, p. 7) **3.** if you take the word **imagination** apart, you will discover that it means merely the postulating of images or the assembly of perceptions into creations as you desire them. (*SA*, p. 158)

IMMORTALITY, infinite survival, the absolute goal of survival. The individual seeks this on the first dynamic as an organism and as a theta entity and in the perpetuation of his name by his group. On the second dynamic he seeks it through children and so on through the eight dynamics. Life survives through the persistence of theta. A species survives through the persistence of the life in it. A culture survives through the persistence of the species using it. There is evidence that the theta of an individual may survive as a personal entity from life to life through many lives on earth. (*SOS* Gloss)

IMPACT, cause and effect simultaneously. (PAB 30)

IMPLANT, 1. a painful and forceful means of overwhelming a being with artificial purpose or false concepts in a malicious attempt to control and suppress him. (*Aud 71 ASHO*) **2.** an

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electronic means of overwhelming the thetan with a significance. (HCOB 8 May 63) 3. an unwilling and unknowing receipt of a thought. An intentional installation of fixed ideas, contra-survival to the thetan. (SH Spec 83, 6612C06)

IMPLANT GOAL, an **implanted goal**—a **goal** the thetan himself has not decided upon—but which has been induced in him by overwhelming force or persuasion. (HCOB 13 Apr 64, *Scn VI Part One Glossary of Terms*)

IMPLANT GPM, an **implanted goal problem mass.** An electronic means of overwhelming the thetan with a signficance using the mechanics of the actual pattern of living to entrap the thetan and force obedience to behavior patterns. (HCOB 13 Apr 64, *Scn VI Part One Glossary of Terms*)

IMPLOSION, something that could be likened to the collapse of a field of energy such as a sphere toward a common center point, making an inflow. It can happen with the same violence as an explosion; but does not necessarily do so. (*Scn 8-8008*, p. 49)

IMPORTANCE, is mass. In thinkingness when you say **importance** you mean mass. (SH Spec 39, 6108C15)

IN, things which should be there and are or should be done and are, are said to be "**in**"; i.e. "We got scheduling **in**." (HCOB 19 Jun 71 III)

INACCESSIBLE CASE, that person who is bound and determined to stay sick, who won't talk to you, will have nothing to do with being healed in any way, is an **inaccessible case.** (5011C22)

INADVERTENT WITHHOLD, 1. the pc thinks he is **withholding** because the auditor didn't hear or acknowledge. (HCOB 13 Sept 65) 2. he didn't intend to **withhold** it, just nobody would acknowledge it. He never intended to **withhold** it at all. An **inadvertent withhold** will cause very near the same phenomenon as an actual withhold. (SH Spec 60, 6506C11)

INCIDENT, an experience, simple or complex, related by the same subject, location, perception or people that takes place in a

DECLARATION OF MICHAEL RINDER

I, MICHAEL RINDER, declare as follows:

1. I am over 18 years of age and a resident of the State of California. I am a director of the Church of Scientology International ("CSI" or "the Church"), the mother church of the Scientology religion. By virtue of my position, I am familiar with the Church's legal affairs, and I have personal knowledge of the matters set forth in this declaration. If I were called upon to do so, I could and would competently testify thereto.

2. In July 1994, another Church staff member, Michael Sutter, and I spent several days in Seattle, Washington, meeting with apostate Scientologists Stacy and Robert Vaughn Young. The Youngs left the Church in 1989, and approximately four years later, in 1993, they appeared as witnesses for hire in litigation against Churches of Scientology, Scientologists or businesses owned by Scientologists. Among the attorneys who hired and paid the Youngs for their testimony was Graham E. Berry of the Lewis, D'Amato firm, who used their purchased testimony many times in Church of Scientology International v. Fishman and Geertz, No. 91-6426-HLH (Tx) (C.D.Cal.).

3. The Youngs' activities had resulted in the Church spending considerable time and energy to correct the falsehoods they had injected into these lawsuits. So we travelled to Seattle to meet with the Youngs in the hope that direct communication with them might lead them to correct their false statements and cease their campaign against the Church. We explained this purpose for our visit when we met with the Youngs first on July 9, 1994. We told them that recently several other

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litigation opponents of the Church had stated that they had wished we had been in direct communication earlier and it may have prevented years of litigation and disputes. We told the Youngs that we sought to avoid that same situation from occurring with them.

4. We were direct and forthright with explaining why we wanted to meet with them. At the beginning of our discussion, both of the Youngs stated that they did not enjoy manipulating the facts to attack and embarrass their former religion, but that economic hardship had compelled them to embark upon that course. At the end, however, it was clear that "economic hardship" was simply a euphemism for amoral greed. Their professed guilt about the dishonest quality of their sworn statements could not overpower their craving for money. Thus, we resolved nothing in those talks.

5. Stacy told us that she believed that it would be in everyone's best interest for the conflict between the Youngs and the Church to end. It was apparent that the reason they were talking to us was because they found it emotionally distressing to be involved in an occupation that required them to figure out how to manipulate and distort facts for use in litigation. Stacy said she could not stand living a lie and wanted out, and that Vaughn also "hated" being involved in the litigation. We explained that we simply wanted to resolve matters, get the record set straight, and the Church and the Youngs could get on with their respective lives. They agreed that this was a desirable objective.

6. Stacy recounted the story of what had happened to them

and how they had come to get involved with writing declarations in the first place. She said that neither she nor Vaughn were good with money and that after leaving the Church in 1989, they had run up tens of thousands of dollars in debts. She said that they first tried to live off various family members while Vaughn attempted to establish himself as a writer. The family eventually balked at that, and the Youngs were on their own. She said they used up their savings and over-extended their credit cards in an unsuccessful attempt to create a computerized, desk-top publishing business. Stacy said that she and Vaughn both wanted to work as writers and eventually took a series of jobs in several small newspapers in the San Diego and Newport Beach areas. These jobs did not pay well, and they were heavily in debt when the last paper for which they worked went bankrupt. Their financial situation worsened as Vaughn was unemployed and refused to take on any employment other than as a writer. Stacy earned the only income, working for an insurance sales firm which she said she hated.

7. Stacy told us that their financial situation deteriorated to the point that she had threatened Vaughn with divorce if he did not get a job. Vaughn then got a job driving a taxi cab. He was unable to continue this however, when, after running out of gas, he attempted to push his vehicle, lost control of it, and injured his leg. Additionally, Stacy said she had suffered a tubal pregnancy, necessitating an operation. Between the medical bills and the lack of a steady income source, Stacy explained that they ended up more than $50,000 in debt. It was in those circumstances that the Youngs turned to trafficking in

anti-Scientology allegations as a means of making money.

8. Stacy said that in early 1993, at the depth of their financial crisis, a British anti-Scientologist, Jon Atack, introduced them to an active anti-religionist in the Los Angeles area named Priscilla Coates. It was through Coates and her attorney, Daniel Leipold, that the Youngs connected up with Graham Berry, for whom they eventually became paid "consultants."

9. At one point in our conversations, Stacy broke into tears and said that she and her husband only began consulting with and selling declarations to Graham Berry because she and Vaughn were so desperate for money. Stacy said she had been willing to say under oath whatever Berry wanted her to say if it would result in getting paid, as she could not face continuing to live under the financial pressure she and Vaughn were suffering. Stacy said that she had made a vow, like Scarlet O'Hara in Gone With The Wind, that no matter what it took, she would never be poor again. Vaughn explained that it was "a great way to utilize twenty years that I was trying to avoid on my resume," and that he could work one afternoon and make what would be a weekly salary in any other job.

10. In the course of the discussions, both Mike Sutter and I brought up how we could not understand how they could tell so many lies in the declarations they had filed, especially those in the Fishman case. Neither denied that this was what they had done, but explained that in order to be able to survive, they provided testimony requested by the attorneys, and that they had to write what was wanted or they would not get paid. Stacy said it was "obvious" they would not be paid to write things that

would be helpful to the Church.

11. We challenged them to explain how they could justify lying as a way of life, and they told us that what they had mostly done was twist facts and used "creative writing" and innuendo to paint a picture that was negative to the Church. They explained that they had tried to avoid explicitly lying about facts so they could not be accused of perjury. Vaughn especially seemed proud of this, and said that he was a writer by profession, which is why he was so good at preparing declarations and why he was paid so well. He claimed that unlike the Fishman case declarations of Andre Tabayoyon, Steve Fishman and Garry Scarff, where the lies and inconsistencies were obvious, his declarations were worded in such a way as to make them much more difficult to discredit. Nothing he said ever disavowed his explanation of how he manipulated facts to create false illusions.

12. Both of the Youngs readily agreed that they could easily set the record straight by writing new declarations which would "clarify" the statements they had made previously. Vaughn said that he did not want to write anything that would be a "direct contradiction" to what he had written earlier, but this was simply a matter of "interpreting" things differently. He said he intended to make his career as a writer and would need "credibility" in order to obtain future jobs, so wanted to do this "properly."

13. Stacy said that by writing such declarations they would "burn their bridges" with the anti-Scientology camp. She went on to say that this would not be difficult to do as they did not

want to be involved in anti-Scientology litigation matters any longer and in fact, they were "between jobs" at the time, so it was an opportune moment to bring this entire episode in their lives to an end.

14. Stacy and Vaughn spoke extensively about matters they had put in earlier declarations during the course of several days of meetings. They explained their true views and talked candidly about many matters. For example, in the Fishman case, Graham Berry wanted them to execute declarations to support the contention that Steven Fishman was an experienced Scientologist. Both Youngs said that this presented a problem as the very data which Berry had given them to orient them to the "facts" of the case proved that Fishman was a fraud. Upon reading Fishman's unpublished manuscript, The Lonesome Squirrel, they told us they had the same reaction: That Fishman was psychotic and that his so-called experiences in Scientology described in his manuscript never occurred. Stacy specifically mentioned by way of example that the manuscript discusses meetings and activities allegedly done by a Church staff member, Lyman Spurlock. Stacy said that she knew that such incidents could not have occurred; that Lyman Spurlock would never have done the actions Fishman alleged and that Fishman's description simply does not match Mr. Spurlock. Further, she knew that the meetings described between Fishman and Church officials simply could not conceivably have occurred. She said the whole manuscript was ridiculous, a fabrication. Vaughn said he could not even finish the manuscript, it was so bad.

15. Similarly, they both described watching a video of Fishman describing the operation of a Hubbard Electrometer

(E-meter). The video was supposed to demonstrate Fishman's competence and knowledge in Scientology. The Youngs said Fishman explained that the meter's "sensitivity knob" was used to keep the meter's needle on its dial, and that this was such a ridiculous mistake that they burst out laughing and knew with certainty that Fishman was not an experienced Scientology auditor.

16. Stacy also pointed out that they both knew that Fishman's claims of having completed the Saint Hill Special Briefing Course -- an advanced course in Scientology counseling -- was a lie, that it was physically impossible for anyone to complete the course in the six weeks Fishman claimed. In fact, after recounting these facts, both Vaughn and Stacy stated that they knew that Fishman and his co-defendant, Uwe Geertz, were both crazy and that their allegations about Scientology were false.

17. Stacy said she had to come up with a way of supporting Fishman's claims for Berry because she needed the money. She said she knew that she could not state in a declaration that Fishman was a long-term Scientologist as that would be, in her words, "completely untrue." Instead, she said that she played with words and concepts so that she could, without directly lying, construct a picture that would create the impression that Fishman knew what he was saying about Scientology. She said she even knew that Fishman was ineligible for Church services due to an extensive history of psychological treatment, and to solve that she had created a way of explaining his "involvement" by alleging that "the Church had negligently allowed Fishman to read

church scripture," and that this "resulted in Fishman's mental state deteriorating." She said that she knew his mental state was not good, and that he knew some Scientology words and terms (though he usually misused them) and therefore this was a "credible" scenario that suited the attorney.

18. Stacy said that her theory was used to support the contention that Fishman had been "exposed" to upper level Church scriptures, even though he had never attained that level in the Church and the materials are kept strictly confidential in the Church.

19. She went on to explain that her distortions had extended to allegations about brainwashing, and that here she had quoted completely out of context from the writings of L. Ron Hubbard. She gave this as a classic example of how one can distort the facts. She said that it was ironic that while she was in the Church she had compiled a pack of materials written by L. Ron Hubbard where he had alerted people to the existence and dangers of mind control techniques through the use of pain, drugs and hypnosis. She had created the pack to rebut falsehoods presented by Bent Corydon in his case against the Church and that it showed that Mr. Hubbard was in the forefront of the condemnation of brainwashing techniques and had developed the first techniques to counteract it. For the Fishman case, however, she explained that she took this very same material and pulled selected quotes out of context to give her declaration a 180-degree reverse "spin." Her Fishman declaration then gave the false impression that Scientology techniques were mind control when, in fact, they are just the opposite.

20. One of the falsehoods I brought up with Vaughn Young was his allegation that David Miscavige was involved in the death of his mother-in-law, and that Vaughn had stated that it was a murder. He said that "if you read my statements exactly ('Mr. Miscavige's behavior was overlooked in the investigation of the death of his mother-in-law... She died... from three shots to the chest and to the temple from a .22 rifle.') you'll see I didn't say David Miscavige murdered his mother-in-law." I told him that this was the impression he created and he replied "Exactly." He said that he could never have directly made the accusation as it wasn't true but he crafted his declaration to create that impression.

21. Young said he had done the same thing when he attempted to create the impression that the Church was involved in the death of Steven Fishman's wife, even though he knew this was simply incredible. However, he explained that they needed statements that would support the defense's position, so he worked with the material he had.

22. This is what led to him supporting Fishman's contention that he had been ordered to commit suicide or to "do an 'end of cycle.'" Young explained that the three words did have a meaning in Scientology, and even though he knew that Fishman falsely claimed the term was Scientology slang for suicide or murder, and that this in fact was further evidence that Fishman was not a Scientologist, he had enough to go on to fashion a statement for a declaration that would be interpreted to support Fishman's claims.

23. Vaughn also said that the Church could be poisoned by

throwing around numerous allegations about the Church ordering people to commit suicide or murder. This was especially difficult to respond to when the events were so old they could not be objectively verified, and where no allegation of wrongdoing had been made at the time, so it would be too time consuming to attempt to correct them all.

24. Vaughn had further expanded on this theory when he stated that one cannot simply leave Scientology -- i.e., cease being a member of the Church -- because a Church policy states that it is better that a person "be dead" than to not be a dedicated Scientologist. Vaughn said he knew the quote was not meant to be taken literally, but again, it was something that as written he could not be charged with perjury for, yet he created a completely wrong impression. Ironically, both of them acknowledged that except for assistance from the Church to help them retrieve their belongings after they abruptly left the Church without notice, they had had no contact with any Scientologists from shortly after they left the Church until they began to file declarations against the Church, a period of more than three years.

25. Stacy also talked about her assertions that the upper level scriptures of the Church were in the public domain. She was challenged on this and admitted that she knew that the Church took great care to maintain the confidentiality of these scriptures as a matter of religious faith and actively would seek to prevent the improper distribution and exposure of these materials. She said she was willing to withdraw her declaration on this matter, as she knew how important this was to

Scientologists.

26. After Vaughn and Stacy had opened up and talked a great deal about what they had been doing in their anti-Scientology litigation, they also discussed some of the other witnesses who had been hired by Graham Berry to attack the Church. Their descriptions match my personal knowledge and made it obvious that these are not credible witnesses. Stacy specifically mentioned Gerry Armstrong and Larry Wollersheim, both of whom were also paid witnesses for Berry. Stacy told me that Armstrong is psychotic and lives in a delusory world in which he holds conversations with God. She said that Wollersheim is as crazy as Armstrong is.

27. They also talked about Andre Tabayoyon. Stacy was especially upset about him, and described an incident in which she and others were at the offices of Berry's law firm. Tabayoyon was upset that he had not been paid and began yelling in a wild and uncontrolled manner and threatening to kill people. When Stacy told him to stop shouting and to act more professionally, he began to make threatening remarks to her. His yelling drew the attention of employees of the law firm who came to see what was going on. When they arrived in the conference room where Stacy and Tabayoyon were located, Tabayoyon abruptly stormed out of the office. Stacy also told me that Tabayoyon continually mistreated his wife, Mary, and that he regarded her as a slave. Both Stacy and Vaughn found this conduct very disturbing, and they said they would find excuses not to have to socialize with the Tabayoyons because they were not good company and had nothing worthwhile to say.

28. The Youngs said they would write declarations to set the record straight on points described above along with others. However, they said that as they would no longer have a source of income they needed help in getting on their feet. They wanted to get into the environmental or animal rights fields. They wanted nothing to do with litigation any longer, and even said that once they got established they might be able to help forward the Church's environmental campaigns and programs. We said we would try to help find them jobs and might be able to assist them with a small loan or possibly even purchase of the rights to future writings to help them while they embarked on a new career.

29. We suggested that while we made inquiries about possible jobs for them, they should put together declarations which would rectify the falsehoods and misimpressions they had created. They agreed that this would be easy for them to do.

30. Mike Sutter and I returned to Los Angeles and contacted Church staff and professionals who had connections in the environmental and animal rights areas and lined up several possible jobs for Vaughn and Stacy.

31. We returned to Seattle some days later to give Vaughn and Stacy the good news about the jobs we had found. We thought they wanted to resolve their differences with the Church and settle down to an honest living and that this would come as welcome news. It became clear almost immediately that they were not interested.

32. They said they had not written draft declarations, and in fact, had been thinking about it and had decided that they wanted the Church to pay them $540,000 -- enough money to live

without having to work for five years. They claimed that if they were to set the record straight it would end their careers as anti-Scientology consultants and that this was a lot of future income to give up. They made no mention of the morality of their position, and when challenged on it, merely responded that this was just a matter of money, not of right and wrong nor truth or fact. They would do and say whatever would make them money.

33. In an attempt to make their ridiculous demand sound reasonable, they stated that even for $540,000 they were not sure that they would write the declarations to correct the record as they had earlier agreed. They said that since we had left they had been in communication with some people they refused to identify, and had been given "legal advice" that if they were to correct the declarations they had filed, the insurance company could sue them for "breach of contract."

34. It should be made clear here that neither of the Youngs has any claim against the Church and both have stated such when asked this question directly in deposition. I brought this up to the Youngs to make clear to them that they couldn't even have a reason for thinking we owed them money. I told them that if they wanted peace they had to voluntarily provide truthful declarations to correct their lies and that we would not accede to their extortionate demand. While admitting that we didn't owe them anything for what they had done while in the Church, their answer was simple. It was not a moral question. They earned a good living distorting facts against Scientology, and for them to stop, we should pay up. Vaughn Young summed up their position by claiming that the more of an asshole one is, the more one is

worth in this game.

35. I told Vaughn that I could not believe he was demanding that the Church pay him an enormous amount of money so he would not have to work at all. He became very indignant at this and threatened that he would "do more" and that we would wish that we had "paid him now rather than have to deal with what he would do to us in the future."

36. Thus the Youngs ultimately refused to put down on paper what they had so willingly told us in person, because we would not pay them for the truth like they had been paid to lie.

37. The Youngs never retracted their admissions that their publicly filed declarations created false impressions and contained lies. In fact, they even said they would now have difficulty carrying on with their "profession" as witnesses due to what they had told us.

38. In summary, the facts are as follows: When we met with them alone, the Youngs candidly admitted what we have been telling the court all along, they have been lying and intentionally distorting facts. They do it knowingly and will readily admit to it outside the presence of an attorney or Court Reporter. They feel comfortable in making these allegations because they know that unfounded accusations against Scientology are given much greater deference in the Courts than are false and degrading accusations made about others. They saw this themselves when they were in the Church, and now they exploit it for cash.

39. No doubt they will now try to deny the facts laid out in this declaration, but when they do so, their motivation should be

remembered. They still have their jobs as anti-Scientology witnesses to protect.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27th day of October 1994 at Los Angeles, California.

Michael Rinder
MICHAEL RINDER

DECLARATION OF ROBERT VAUGHN YOUNG

I, Robert Vaughn Young, declare as follows:

1. I am over 18 years of age. I am a resident of Seattle, Washington. The matters set forth herein are of my own personal knowledge and I would be capable of testifying if called to do so.

2. Because I have over 20 years as a staff member in Scientology, most of it as an executive and as part of the elite "inner circle," I am most familiar with this organization and its tactics. I fled with my wife in 1989. For the last year and a half, I have served as an expert legal consultant on Scientology in several cases, including the case of Church of Scientology International (CSI) v. Steve Fishman and Uwe Geertz (91-6426-HLH [Tx] [C.D.Cal.]) where once again Scientology clogs the courts with alarming and misleading facts and blatant false testimony in a last-ditch attempt to discredit my testimony as well as that of my wife, Stacy Brooks Young.

3. Because my wife and I have 35 years in Scientology between us, we have considerable knowledge how this organization operates. We presented not only our experience but Scientology documents to show how Scientologists are permitted to lie and cheat in the name of Scientology. It is their notorious "Fair Game Doctrine" that I detailed earlier with their own writings that allows them to violate the law with an end-justifies-the-means attitude that they are above the law, that the law must be used to harass and destroy, rather than win suits. That is why they withdrew from this case and now why they continue to fight: to harass defendant Geertz, his counsel and his experts consultants. It is why they fanatically harass others who oppose them.

4. In the named declaration, Rinder tries to say that they met with my wife and me to "set the record straight." Let me clarify this. For over one month, Mike Sutter of the Religious Technology Center (RTC) called me, almost daily, pleading with me

to meet with them, saying it would be "well worth [my] while" to do so. I declined but he persisted, week after week. He and Mike Rinder (of Plaintiff CSI) even appeared on my front lawn, tapping on my windows, trying to meet with me, insisting that it would be worth my time, clearly implying that they wanted to pay me money. I continued to decline to meet with them or even discuss the matter. They called my wife, badgering her with the same story. So the idea that they met with us to give us the opportunity to "set the record straight" is a complete fabrication. They wanted to meet with us to pay us money to change our testimony.

5. At my wife's request, we met with them in Seattle. They told us that they wanted to get declarations sealed or removed but they had no other avenue left but us. I told them they should talk to Geertz's attorney Graham Berry. They called him names and said there was no value in doing that. I told them they should talk to defendant Geertz. They did the same towards him, calling him "crazy." They said if we helped them to seal the records or get them removed, they would "help" us. When we began to balk, they gave veiled threats of the power of the organization, how it could be used to destroy us unless we accepted their offer and made a new declaration. They would not say what the new declaration would say or what "agreement" I would have to sign. This went on for days so I played along with them to see what it might be.

6. I wanted to see what "agreement" they would insist on and what they wanted me to say to "set the record straight" because Vicki and Rick Aznaran had earlier met with Sutter and Rinder and had "recanted" their declarations and were now making ridiculous statements on behalf of Scientology. I had heard that the Aznarans had been paid a large amount of money to retract their testimony and to "help" Scientology instead. Thus I wanted to see what the Sutter and Rinder approach was and how they might buy off a witness or potential witness.

7. During days of talking with them, it was difficult at times to even stay in the same room with them and a couple of times the meetings were very short. I simply had to call them off because I couldn't stomach their sense of reality. But I kept coming back because I wanted to see their offer for they had made it plain that they would not show us anything unless they were convinced that we were "sincere" and if I walked out, they wouldn't let me see their cards. They finally asked us to draft what we might say to "set the record straight." Since we had no intention of making such a statement, we took a couple of days "working on it" and came back saying we were "having trouble" with the idea and could they offer us any direction or ideas? They finally showed us "notes" of what they wanted us to sign for $200,000.

8. Until this time, the meetings had been held at our home, except for the very first day. But I had asked that this meeting (when they showed us their ideas and the agreement) be at their room at the Doubletree Inn for I wanted a place to walk out of, for I knew what was about to happen. And I knew that if they were in my home, they would have refused to leave and would have continued to press the issue. They showed us what they wanted us to declare for money. Basically they said that we had lied, that we were sorry for what we had done, that Graham Berry had put us up to all of it, that we had done it only for money, etc. In short, exactly what Rinder has now tried to claim. There was one set for me and one for Stacy. We read each other's. It was everything I could do to hold my temper at their sheer criminal arrogance. We had told them time and again that everything we had said was true, that Berry had not written anything for us, etc., and now it was as if nothing had been said. I saw that they really thought they could simply buy our testimony.

9. I knew that if I blew it then, they would not show me the "agreement" so I said I wanted to talk to Stacy privately. We went out and agreed to hedge more so we could see their "agreement." We went back in and when asked what we thought, Stacy said how their points "need some editing" but they were "in the ballpark."

Wanting a copy of it (so I could file it in court) I asked if we could make a copy of this so we could write our declarations. They declined.

10. I then asked to see the "agreement." They showed it to us. Unlike the earlier document, this was a full legal paper that we could have signed right then. It said that we would no longer work on any Scientology matters, that we would never talk about the subject publicly, that we would never write about it, that we could not meet with other former Scientologists, etc. In other words, we were being asked to give up all of our basic Constitutional Rights. It also said we would "help" them to get the rest of the material in the Fishman-Geertz case removed from the records. When I saw that, I knew that was how they had hooked the Aznarans. It explained why the Aznarans continue to file declarations: they are "helping" according to their Faustian contract, i.e., saying whatever Scientology wants them to say.

11. When Stacy and I had read what amounted to a gag order, we went out and talked and that was when we agreed that it was time to end the meeting. We went back in and did. Sutter and Rinder both tried to convince us to stay and talk about it some more but we refused and went home. They were supposed to fly out that day.

12. They called us a few hours later, trying to meet with us again. We refused. They apparently flew back to Los Angeles. And for the next week, they continued to call us, asking us to meet with them again, promising that they would make it "even better" for us, which I assumed meant more than the $200,000. We refused to meet with them or discuss it.

13. There are several points I want to make about these meetings. First, it was Scientology that sought the meetings and Scientology that made the offer that we change our testimony. It was Scientology representatives that threatened that they would "do anything" needed to destroy our credibility and to take us out of the case.

14. During the meetings, at one point Rinder finally confessed to me that my wife and I are under continuing surveillance. We were sitting out on the sea wall and I was

remarking on the private investigators following me and Rinder tried to deny it. Come on, Rinder, I said. You're not talking to a newcomer! I was in there for 20 years! I know how it works! Finally, he went, "Okay, okay. So there are PI's [private investigators] all over you."

15. I have read my wife's declaration of this date. Her account of the meetings are accurate, drawn with her own perspective and her emotions. Like her, I stand by all of my earlier declarations, especially those that detail how Scientology is supposed to abuse the legal system to achieve its ends. That is what they are doing here.

16. Part of Rinder's problem is that he bought our tactic on the final day when we wanted to see their proposed declaration and the gag order. His other problem is that he has to follow orders to do everything he can to destroy our repute and thus he must twist the facts and even lie. Then again, I don't know how much he even believes any more. My conversations with him shows that he is fully in the grip of the cult, as is his family and thus he no longer has the ability or the courage to do anything else. This is sad. That he would take the last shreds of our friendship and use it in this way is sad. But it is also in keeping with what he bluntly told us in our home: "There is nothing I wouldn't do to protect Scientology. Nothing."

I declare under penalty of perjury and the laws of the United States and the State of Washington that the foregoing is true and correct.

Executed this 14th day of December, 1994, in Seattle, Washington.

Robert Vaughn Young

DECLARATION OF STACY BROOKS YOUNG

I, Stacy Brooks Young, declare as follows:

1. I am over 18 years of age and a resident of Seattle, Washington.

2. I was a Scientologist for nearly 15 years, from January 1975 until I escaped with my husband, Robert Vaughn Young, in July 1989. From October 1975 until I left I was a member of the elite inner circle of Scientology, an unincorporated organization known as the Sea Organization ("Sea Org") which rules the Scientology empire. Unbeknownst to the outside world, even to lower level Scientologists, the head of the Sea Org and of Scientology, David Miscavige, subjects Sea Org members to extremely abusive and degrading treatment, sometimes carried out directly by him but often carried out by his key aides.

3. Such abuses include sleep deprivation, an enforced diet of nothing but rice and beans for weeks or even months at a time, incarceration in Scientology prison camps known as the Rehabilitation Project Force ("RPF") for months and sometimes years, sexual harassment and discrimination, requiring women to undergo abortions with the threat of losing their jobs if they refuse, enforced separation of parents and children, enforced separation of husbands and wives, and denial of proper medical care for people driven into psychotic episodes as a result of such abuse as described above.

4. A year and a half ago, in July 1993, my husband and I were asked by several attorneys to document the abuses we experienced and witnessed while in the inner circle of Scientology. These attorneys were defending people who were being sued by Scientology. Until that time we had kept totally quiet about our experiences because we were aware of how Scientology intimidates and harasses anyone who speaks out publicly about the abuses in this organization. We knew that if we began

to talk about what we knew our lives would no longer be our own, that Scientology would apply their "Fair Game" doctrine against us. The Fair Game doctrine directs Scientologists to lie, cheat and destroy anyone perceived as an "enemy." They claim that Fair Game was canceled long ago, but they are lying. Because we had seen it done to others, we knew that they would send private investigators to talk to our family, friends and neighbors, that they would dredge up everything they could about our private lives, in short, that we would be subjected to a campaign of character assassination just as any other fascist political movement like Scientology would conduct against its critics. However, we made the decision that it was too important to make the truth known, no matter what the cost to our own privacy.

5. The Scientologists have lived up to our worst expectations and beyond. They have stolen our trash, kept us under constant surveillance, sent out libelous information, slandered us to friends and family, and done everything possible to make us "shudder into silence," as Scientology creator L. Ron Hubbard directed them to do with critics. Our home has also been burglarized twice, and while we cannot prove that Scientology was responsible, we pointed out to police investigators that only our in-home office computers and disks were stolen, while other valuables in the house were left untouched.

6. In July 1994, just this past summer, two high level Scientologists approached my husband and me and offered to pay us money if we would perjure ourselves by stating under oath that the information we have provided in sworn declarations is false, which it is not, and agree never to speak or write another critical word about Scientology again. These two Scientologists warned us that if we refused to agree to their terms they would increase the intimidation and harassment of us, break us financially, and ruin our reputations. We still refused to give in to their threats.

7. True to their promise, they have stepped up their campaign against us in the last several months. It is continuing as recently as Monday, December 12, when a

private investigator called my mother and, under the guise that he was doing an investigation of my husband, attempted to turn my mother against me with lurid tales about my sex life. His attempt backfired, however, when my mother made it clear to him that she does not care about my sex life and that his attempt at character assassination made her sick. She demanded to know his name and phone number, and when he refused to give it to her she hung up on him. What they don't realize is that people outside of Scientology don't adhere to their Draconian morality, which especially in the Sea Org is so intrusive that people are sent to the prison camp for their sexual practices (the only exception being Miscavige's hand-picked aides, for whom these same laws do not apply). This same private investigator has already called one of my sisters and my other sisters are now expecting calls from him as well. Our family and friends are aware that this campaign is being waged against us and that it is being done because Scientology has not been able to silence us any other way.

8. I have been shown an extract of a motion made by Church of Scientology International in the case of Church of Scientology International v. Fishman and Geertz, No. 91-6426-HLH (Tx) (C.D.Cal.) in which CSI falsely alleges that my husband and I committed perjury in certain declarations we have submitted for this case. The extract is entitled Two Other Defense Witnesses Signed False Declarations. ([redacted] 564 56[redacted]) The phrase "two other defense witnesses" refers to my husband and me. It is false.

9. The extract is based on a certain "Rinder Declaration," submitted October 27, 1994, which is a wildly distorted, false representation of a series of meetings which occurred over an eight-day period in July 1994.

10. In June 1994, two high-level Scientology operatives, Mike Rinder and Mike Sutter, began to call me and my husband begging us to meet with them to "settle our differences." These two people called one or the other of us nearly every day for approximately a month, insisting that we meet with them and assuring us that they

would make it very worth our while to do so, clearly implying that they wanted to pay us money to stop doing the legal consulting work that we have done for Mr. Graham Berry and other attorneys whose clients have been sued by Scientology.

11. My husband Vaughn had no interest in meeting with them at all and told them so in no uncertain terms. Rinder and Sutter continued to call him and even arrived uninvited at our house in Corona del Mar, California, (where Vaughn was finishing up some work in preparation for moving to Seattle,) to try to get him to agree to a meeting. When it became obvious that Vaughn would not agree, they began calling me at our house in Seattle.

12. Mike Sutter called me every day, telling me how important it was that we meet with him and Rinder. Both Mike Sutter and Mike Rinder were superior to me and had a tremendous amount of power over me when I was a member of the cult. Sutter in particular had been assigned to "handle" me after Vaughn and I had tried to leave the cult and had been persuaded to return. Because of this past relationship which I now understand was based on mind control, I was still afraid of Sutter even five years after leaving Scientology. I allowed him to engage me in conversation, and by intimidating me he succeeded in convincing me that Vaughn and I should hear them out. I then talked Vaughn into meeting with them.

13. My state of mind at the time was that I did not want to have anything to do with Scientology any more. Although I did not realize it at the time, I was still under the influence of the cult to the degree that they could still intimidate me, frighten me, and "trigger" strong emotional reactions in me. Scientology was particularly upset about the work my husband and I had done for attorney Graham Berry, advising him about the destructive practices of the upper echelons of Scientology and submitting a number of declarations relevant to CSI v. Geertz. As I explained earlier in this declaration, because of our work for Mr. Berry and other attorneys, Scientology considered us "enemies" and we became the targets of Scientology's

Fair Game doctrine, meaning that we had been harassed and intimidated relentlessly by Scientology operatives. Although they attacked my husband much more viciously than me, it upset me very deeply and frightened me. I did not want to have my private life exposed and I did not want to see my husband's private life being distorted and exposed and held up to ridicule the way Scientology had been doing.

14. Because of their relentless harassment and intimidation, I had made a decision not to do any more work to expose the truth about the Scientology cult and, indeed, had not done so for several months prior to the meetings with Rinder and Sutter. I was also strongly pressuring my husband to stop so that we could regain our privacy and peace of mind. I wanted Scientology to leave us alone.

15. It was in this frightened state of mind that I began to receive the daily phone calls from Mike Sutter. Sutter assured me that the harassment would stop and made it clear that Scientology would pay us a large amount of money if we would settle with them. Sutter also made it clear that if we did not agree to settle with Scientology, we would be subjected to even greater harassment than we had already experienced, although he said that he was "sorry" and that "it doesn't have to be that way," if we would only agree to talk to them. I felt extremely intimidated by his phone calls and strongly pressured Vaughn to agree to talk to them. Although Vaughn did not feel that they were being above-board about their intentions, he agreed to it because he knew that I was very afraid of them and he did not feel he should force me to continue in a situation that was extremely frightening to me.

16. Mike Rinder and Mike Sutter arrived in Seattle on Friday, July 8, 1994. Vaughn also flew to Seattle on that day. Vaughn and I met with them nearly every day for the next eight days. I was extremely gracious and cordial to both of these Scientologists throughout the meetings, inviting them to our home and doing everything possible to create an atmosphere of trust and honor. After reading Rinder's declaration I feel betrayed and outraged that he has now perverted and

twisted things that my husband and I talked to them about during those meetings. I do not fault these two individuals. I know that they are under the influence of Scientology mind control and that the vicious lies Rinder has sworn to in his declaration are part of the campaign of character assassination that he is under orders to conduct against my husband and me.

17. However, I wish to correct the many lies and perversions of the truth that he has told about us. I also want to make it clear that I went along with much of what Rinder and Sutter said to us because I knew it would do no good to argue with them about much of what they were saying. Someone under the influence of Scientology mind control cannot change his mind about certain attitudes and beliefs, and I was aware that because these two people were still under the control of Scientology it would do no good to try to argue with them. Therefore, Rinder seems to have come away from the meetings thinking that I agreed with what he said simply because I did not refute it. The fact is that I did not bother to refute many things he and Sutter said because I knew it would be a waste of time. Furthermore, my husband and I had agreed to go along with them so that we could find out whatever it was they had to say to us that was so important that they had begged us to meet with them for over a month. The reason the meetings went on for so many days was that we kept waiting for them to get to the point and weren't able to find out what it was until the eighth day. (When we did finally get them to get to the point, we walked out.)

18. First and most importantly, at the very outset of these meetings we made it clear that we would not perjure ourselves by recanting any statements made in our previous declarations, that what we had stated was true and we would not now lie by saying that what we had written was not true. Much to their dismay, we also made it clear immediately that we would not in any way denigrate Mr. Graham Berry. They tried to change our minds about Mr. Berry by suggesting that he had put us up to writing our declarations, but we were emphatic in stating that he never did any such

thing and we would not say that he did. At the end of the series of meetings we discovered that, indeed, one of their main purposes was to get us to discredit Mr. Berry, who has been extremely successful in litigating against Scientology. A key theme in the declarations they drafted for us to sign was that Mr. Berry had orchestrated every aspect of our "attack" against Scientology. We refused to go along with their character assassination of Mr. Berry.

19. Throughout the meetings they repeatedly suggested that we write declarations but were vague about what they wanted the declarations to say. When they would bring up the subject of these declarations we would repeat that we could not write anything that would in any way suggest that we had lied, since we had not. At one point Sutter asked me what I felt I would be able to say, and I replied that I would be able to say I had written declarations as an expert witness for the defense of Uwe Geertz and Steven Fishman and that I had written them in a way that would be helpful to their defense. It is utterly false that "when the Youngs -- especially Stacy Young -- spoke frankly about what occurred here, they revealed that their declarations, too, had been falsified." We repeatedly emphasized to both Rinder and Sutter that nothing whatsoever in our declarations was false.

20. Many of the statements in the Rinder declaration are entirely false, while others are treacherously misleading in the way statements we made are misinterpreted and deliberately twisted to make me or my husband appear to be dishonorable or unscrupulous.

21. It is completely and utterly untrue that "At the beginning of our discussion, both of the Youngs stated that they did not enjoy manipulating the facts to attack and embarrass their former religion, but that economic hardship had compelled them to embark upon that course." Neither my husband nor I have ever believed that Scientology is a religion and would never refer to it as such. Furthermore, neither of us feel that we have manipulated facts. On the contrary, we have told the truth about

many destructive practices that are part of the Scientology empire in the hopes that exposure of these conditions will lead to their being changed.

22. Rinder's opinion that "it was apparent that the reason they were talking to us was because they found it emotionally distressing to be involved in an occupation that required them to figure out how to manipulate and distort facts for use in litigation" is contrived and utterly false. Moreover, I never said that I "could not stand living a lie and wanted out." As I have explained in a previous paragraph, what I found emotionally distressing was the campaign of harassment, intimidation and character assassination Scientology has been waging against us ever since we began to speak out about the abuses inside the cult.

23. Rinder's statement that I said we "tried to live off various family members while Vaughn attempted to establish himself as a writer" is utterly untrue and a fabrication out of thin air, as is the comment that "the family eventually balked at that, and the Youngs were on their own." We never "tried to live off" any of our family members and have been "on our own" all along.

24. Vaughn and I did have financial difficulties when we first left Scientology, as do many long-term members of Scientology's inner circle (and any other totalitarian cult, for that matter) if they are fortunate enough to free themselves from the cult's psychological, emotional and physical subjugation. Vaughn had been a Scientology staff member for 20 years and I had been one for 15 years. We had no résumé that we felt would make any sense to the "outside" world, nor did we have any references. We were considered "enemies " by Scientology, so we knew that people still inside the cult would not say anything favorable about us. Since we had had virtually no professional contact with anyone outside the cult for many years, we had no references. It was literally as if we had just landed from outer space.

25. I am sorry that I told these two Scientologists about the hardships Vaughn and I experienced as we were struggling to come out of the cult experience. I should

have realized that they would utilize these details of our personal life in their campaign to discredit us. Rinder has now taken this information and twisted it to support his false argument that we are exposing the truth about Scientology to make money. The Court should know that there are many, many other ways we could make a living that would be much more enjoyable and more lucrative. But we feel a moral obligation to do what we can to expose the civil and human rights violations and serious abuses which this cult is perpetrating on its subjugated mind control victims.

26. Rinder falsely states that "At one point in our conversation, Stacy broke into tears and said that she and her husband only began consulting with and selling declarations to Graham Berry because she and Vaughn were so desperate for money. Stacy said she had been willing to say under oath whatever Berry wanted her to say if it would result in getting paid, as she could not face continuing to live under the financial pressure she and Vaughn were suffering. There was one point during the meetings with Rinder and Sutter when I did, indeed, break into tears. It was certainly not, however, for the reason Rinder states. I began to cry at one point as Mike Sutter was attempting to address my concerns about staff conditions and certain specific abuses I suffered while I was in the cult. Something he said triggered some extremely painful memories for me, memories of being forcibly separated from my husband, having our mail intercepted, being kept under guard to keep me from escaping to find my husband, being deprived of sleep for days on end, being locked in a room and interrogated for days at a time, being screamed at and terrorized by Miscavige and his top aides.

27. For many former cult members, certain things someone might say or do can trigger painful memories from their cult experience and they may find themselves becoming very emotional at unexpected times. I found that simply being in the same room with two members of Scientology's inner circle, two people who used to have

enormous power over me, stirred deep-seated emotions that I had not felt since I escaped from the cult. Of course, I did not explain this to these two Scientologists because I knew they would not understand. But certainly I was not upset for the reason Rinder has stated. He is trying to paint my relationship with Graham Berry in a scurrilous light but his accusations are utterly groundless and false. Mr. Berry never told me what to say in my declarations and certainly never drafted a declaration for me to sign the way Rinder and Sutter did for my husband and me. In fact it is the Scientologists who will say whatever will further their own agenda, regardless of whether it is true or not, just as Rinder has done in his declaration. They assume that people outside of Scientology have the same contempt for the legal system as they do, and that others are guilty of the same illegalities, such as perjury, which they commit themselves as a matter of course.

28. Rinder states that "both Mike Sutter and I brought up how we could not understand how they could tell so many lies in the declarations they had filed, especially those in the Fishman case. Neither denied that this was what they had done ..." and repeats his character assassination of us as liars in the next paragraph where he states, "We challenged them to explain how they could justify lying as a way of life. .." As I have stated earlier in my declaration, in fact my husband and I both repeatedly told them that we had not lied in our declarations, although throughout the meetings Rinder and Sutter did continue to characterize our sworn testimony as "lying." The truth is that if either of these people ever admitted to themselves that our testimony is true it would break the spell that Scientology has over them. But Scientology has a self-policing mechanism built into its mind control techniques which makes it almost impossible for someone under its influence to break through. Rinder and Sutter both know that our testimony is true. They are both acutely aware of the abuses we have described. But they are loyal Party Members and are sworn to protect the Party at all costs.

29. Clearly the main intent of Rinder's declaration is to discredit the declarations my husband and I have filed in CSI v. Fishman and Geertz. He seems most concerned with a declaration submitted by me on January 3, 1994, in which I detail how Scientology's fraudulent negligence in selling Steven Fishman nearly $200,000 of Scientology materials and devices could have driven him into a psychotic episode. Rinder goes on for several pages, carefully reconstructing our conversations to make it appear that I somehow admitted to him that what I wrote was untrue. The subject of my January 3 declaration is extremely sensitive for Scientology and this is why Rinder has spent so much time trying to discredit it. But what I wrote in the declaration is true, and I attached many Scientology documents to prove it.

30. In fact, many people have been driven into psychotic episodes by Hubbard's techniques, as Rinder well knows. Far from being "pure nonsense," what I wrote about is one of Scientology's darkest secrets. I have personal knowledge of many people who have been driven into psychotic episodes by Scientology's techniques. Hubbard wrote precise directions about how to "handle" these people, including the "Isolation Watch." Rinder is well aware of these occurrences but cannot admit to it because it would violate Scientology policy for him to tell the truth about this subject publicly. It would threaten his good standing as a Scientologist and might get him sent to the prison camp, known as the Rehabilitation Project Force, where he would be separated from his wife and children, kept under guard and forced to do hard labor for 12 or more hours a day. Scientologists will do just about anything to avoid being sent to the RPF.

31. Rinder falsely states that I admitted to creating a false impression in the January 3 declaration about Scientology creator L. Ron Hubbard's use of mind control techniques. In fact, it is my firm conviction that Hubbard developed extremely sophisticated mind control techniques, that he did so quite deliberately, and that Scientology practices can be very psychologically damaging because of this. I

did not pull quotes out of context for the declaration as Rinder asserts. I would be happy to provide more quotes from Hubbard in which he goes into even more detail about how Scientology can be used destructively.

32. Rinder also distorted a conversation I had with him concerning Scientology's "upper level" materials. I do know that Hubbard wanted these materials kept secret, but I do not agree that they should be. People have the right to know that Hubbard's science fiction story about the cosmos is what they can expect after they have been sold many thousands of dollars of Scientology services. I do not consider a science fiction story to be a religious scripture, nor do I believe (as Scientologists claim) that there is any danger that anyone will get sick by reading these materials "before they are ready." This story has been published in many, many publications over a period of many years, and I have yet to hear of one person who has gotten sick from reading it. I think the only reason the Scientologists are so worried about keeping these materials secret is that they are afraid of losing money if people learn the truth. Certainly it has absolutely nothing to do with religion.

33. Rinder attempts to use me to further his own agenda in discrediting other former Scientologists. He falsely states that I think Gerry Armstrong and Larry Wollersheim are both psychotic. To set the record straight, I do not think either of these individuals is psychotic. Indeed, I think both are doing very well at recovering from their lengthy experience with Scientology mind control. However, I do know that Rinder and Sutter both think Gerry Armstrong and Larry Wollersheim are psychotic. I also know that they think my husband and I are psychotic, along with many other people who have come to their senses and left Scientology. This is because Hubbard said so. He repeatedly stated that anyone who leaves Scientology is psychotic. When I was still in Scientology and working for the Office of Special Affairs, it was accepted as a basic truth that anyone who left Scientology was crazy, especially anyone who left and then sued Scientology, which both Armstrong and Wollersheim

have done. The truth is that I consider Gerry Armstrong and Lawrence Wollersheim to be good friends and very courageous individuals.

34. Rinder also attempts to use me to discredit the testimony of another former Scientologist, Andre Tabayoyon. Rinder's version of my relationship with Andre and his wife Mary is wildly distorted and is clearly an effort on his part to create bad feelings between us. This is a technique called "Third Party" in Scientology, in which someone deliberately tells lies about a person to turn friends against friends. I did discuss an incident involving Andre, but I did so in the context of voicing concern about a friend. I now regret ever having said a word and realize I should have known he would use it to try to destroy my friendship with Andre and his wife, Mary. The conversation was carried on at Rinder's urging, of course, and I was naive not to see what he was doing. In fact, I value my friendship with Andre and Mary and think they are both extremely courageous to have testified about the outrageous abuses they were both subjected to while in Scientology. I hope they are progressing well in their recovery from Scientology.

35. My husband and I never agreed to "write declarations to set the record straight on points described above along with others." In fact we never did write any declarations or even portions of declarations but rather waited until Rinder and Sutter presented us with their own declarations, drafted by Scientology, for us to sign. When we read them we discovered that they had drafted declarations which did exactly what we had told them repeatedly we would not do. The declarations they wanted us to sign were utterly perjurious, stating that we had lied about virtually everything we have ever stated in declarations submitted in CSI v. Fishman and other cases. Additionally they wanted us to sign a gag order which would have destroyed our freedom of speech as well as our freedom of association by forbidding us ever to speak about our experiences in Scientology or even to meet with anyone else who was speaking about their experiences in Scientology.

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36. The motion which is based on Rinder's declaration makes the wildly ridiculous claim that we were in "serious emotional turmoil over what [we] had done" and that we "agreed to execute new declarations undoing the false impressions they had created for Mr. Berry." In fact, as I have already stated, we never did execute any declarations for them at all, and the declarations they drafted for us to sign were completely outrageous.

37. The truth is that when they showed us the declarations they wanted us to sign I told them they were completely wrong to think we regretted any aspect of the work we had done for Mr. Berry. Indeed, I told them in no uncertain terms that I am very proud of the work I have done for Mr. Berry, because I feel it is extremely important for the truth to come out about Scientology.

38. Finally, the motion claims that we "demanded" to be paid an outrageous sum of money but that "the Church was and is unwilling to pay the Youngs to tell the truth." In fact, they offered to pay us nearly $200,000 to sign their false and perjurious declarations, but we refused. We told them that we would never sign their declarations no matter how much money they gave us, because we would never perjure ourselves nor would we become pawns in Scientology's vendetta against Graham Berry.

39. Vaughn and I walked out of the meetings at that point, although they begged us to stay. They continued to call us repeatedly over the next several days, imploring us to meet with them again, assuring us that they would give us a "substantial financial settlement," but I finally made it clear to them that there was no point in continuing the meetings. Vaughn and I have made our decision to continue to expose the truth about Scientology no matter the cost, and that is what we intend to do. Rinder's blatantly false declaration is simply another part of their campaign to destroy our reputations and our credibility, which is what they warned us they would do if we did not give in to their demands.

40. During the course of our meetings Rinder commented that he couldn't think of anything he wouldn't do to silence an enemy of Scientology, that as far as he was concerned, the end would justify the means. Sutter and Rinder both made veiled threats during the course of the meetings, making it clear that if we did not settle with them Scientology would ruin our reputations, break us financially, and generally make our lives miserable. True to their threats, Scientology is now doing everything possible, including submitting perjured testimony to this court, to discredit me and my husband. But all of the testimony I have submitted to this court has been true, and it is extremely important that the information which has been submitted remain on the public record.

I swear under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed in Seattle, Washington, this 14th day of December, 1994.

Stacy Brooks Young

Stacy Brooks Young

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Webster's Third New International Dictionary

OF THE ENGLISH LANGUAGE
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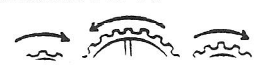
syn·crat·ic \ˌidēəˈsinˈkrad·ik, -dē(ˌ)ōˈs-, -siŋˈ-, -atl,
adj [fr. idiosyncrasy, after such pairs as E apostasy:
tic] 1 a : peculiar to the individual ⟨an ~ gesture⟩
relating to, or resulting from idiosyncrasy ⟨~ response
ug⟩ ⟨~ disease⟩ 2 : marked by idiosyncrasy : ECCEN-
s so[illegible]n his literary judgments that it is impossible to
of h[illegible] a sound critic —Saturday Rev.⟩ — id·i·o·syn-
·ca[illegible]|ək(ə)lē, |ēk-, -li\ adv
ncratic \"\ n -s : one that is idiosyncratic
\ˈidēət, chiefly dial ˈijət or ˈējət; usu |d·+V\ n -s
fr. MF idiote, fr. L idiota, fr. Gk idiōtēs person in a
station, person without professional knowledge,
nt person, common man, fr. idios one's own, private,
ar; akin to L sed, se without, sui of oneself — more at
E] 1 obs : an ignorant or unschooled person : a simple
ned person : CLOWN 1 2 : a person afflicted with
: specif : a feebleminded person that has a mental age
ceeding three years and accordingly requires complete
ial care 3 a : a silly simple person : SIMPLETON,
HEAD ⟨he means well but he is such an ~⟩ b : a person
ails to exhibit normal or usual sense, discrimination,
gment esp. at a particular time or in respect to a par-
subject ⟨I don't know why I was such an ~⟩ ⟨a
~ about budgeting⟩ c : a professional fool : JESTER
k idiōtēs] obs : a person in private station or one not
ied in a trade or profession : LAYMAN syn see FOOL
\"\ adj [ME, fr. idiot (n.)] 1 : IDIOTIC 2 : fit for,
l of, or suitable to idiots : being such as an idiot might
pected to have, engage in, display ⟨~ terror⟩ ⟨those ~
⟨such ~ war⟩
oard n : a device (as a projection of a script) used to
ot a television speaker and placed out of camera range
·cy \ˈidēətsē, -si\ n -ES [¹idiot + -cy] 1 : IDIOCY 1
mething worthy of an idiot : utter folly
·ic \ˌidēˈäd·ik, -ätl, |ēk\ adj [LL idioticus unskilled,
simple, fr. Gk idiōtikos private, unprofessional, or-
y, fr. idiōtēs + -ikos -ic] 1 : relating to or like an idiot
aracterized by idiocy : FOOLISH, SENSELESS
·i·cal \|äkəl, |ēk-\ adj [LL idioticus + E -al] 1 obs
ing education : IGNORANT, UNSCHOOLED 2 : IDIOTIC 2
·i·cal·ly \|äk(ə)lē, |ēk-, -li\ adv 1 : like an idiot : in
ot or idiotic way ⟨behaved ~⟩ 2 : ABSURDLY, RIDICU-
Y ⟨~ cheap⟩
·i·cal·ness \-kəlnəs\ n -ES : extreme stupidity or
hness
·ism \ˈidēəd·ˌizəm, -ēəˌti-\ n -s [in sense 1, fr. MF
sme, fr. L idiotismus common or vulgar manner of
ing, fr. Gk idiōtismos way of a common man, manner of
n of a common man, fr. idiōtēs common man + -ismos
in sense 2, fr. ¹idiot + -ism — more at IDIOT] 1 a obs
M 1 b : IDIOM 2 2 archaic : IDIOCY
·ize \-əd·ˌīz, -əˌtīz\ vt -ED/-ING/-S [¹idiot + -ize]
make a fool of : cause to become or behave like an idiot
·ry \-ətrē, -ri\ n -ES [¹idiot + -ry] chiefly Scots law
OCY
savant \pronunc at IDIOT + pronunc at SAVANT, or
saˈväⁿ\ n, pl idiots savants \-n(t)s, -äⁿ(z)\ [F, lit.,
d idiot] : a person that is in general mentally defective
hat displays unusual aptitude or brilliance in some special

s del[illegible]t n : any of various solitaire card games
she[illegible] idiot card n : a large card bearing usu. hand-
ed [illegible], or phrases for prompting a speaker or actor
g a telecast — compare IDIOT BOARD
·zome \ˈidēəˌzōm\ n -s [ISV idio- + Gk zōma girdle
ore at ZONE] : ACROSOME
ol \ˈidəˌtól, -tōl\ n -s [ISV idose + -itol] : a sweet
alline hexahydroxy alcohol $C_6H_{14}O_6C_6H_8(OH)_6$ ob-
d by a reduction of idose or sorbose
ım \ˈidēəm\ also -id·i·on \-ēˌän, -ēən\ n suffix, pl
ums \-ēəmz\ or -id·ia \-ēə\ also idions [NL, fr. Gk
n, dim. suffix] : small one : lesser one ⟨antheridium⟩
omidium⟩
\ˈīdᵊl\ adj idler \-d(ᵊ)lə(r)\ idlest \-d(ᵊ)ləst\ [ME
also, empty, void), fr. OE idel; akin to OFris idel empty,
nless, vain, OS idal, OHG ital] 1 a : lacking worth or
: leading to nothing : GROUNDLESS, USELESS ⟨~ theoriz-
⟨an ~ rumor⟩ ⟨it would be ~ to argue further⟩ b : hav-
no particular reason for existing or occurring : light,
al, and superficial ⟨~ chatter⟩ ⟨took an ~ glance about⟩
ed out of ~ curiosity⟩ 2 a : not occupied or employed:
) of a person : having no employment or business : UN-
OYED ⟨closed factories and ~ workmen⟩ (2) of a period of
: marked by want of activity esp. of a useful or con-
tive nature : WASTED ⟨passed his ~ days in sloth⟩ ⟨that
our just before dusk⟩ (3) of a thing : not turned to normal
ppropriate use ⟨~ tenements⟩ : not called into active
ce ⟨~ capital⟩ b (1) : given to rest or ease : seeking to
d labor or employment : TRIFLING, LAZY, SLOTHFUL
areless ~ worker⟩ ⟨~ boys playing in the streets⟩ (2) : hav-
no regular occupation or evident lawful means of support
wer to the charge of being an ~ person⟩ (3) : IDLING
engine running at fast ~ speed⟩ 3 now dial Eng a : LIGHT-
DED, FOOLISH b : MISCHIEVOUS syn see INACTIVE, VAIN
\"\ vb idled; idled; idling \-d(ᵊ)liŋ\ idles vi 1 : to
or spend time in idleness ⟨idling in the garden⟩; esp : to
e idly ⟨idled along the stream bank⟩ 2 : to run discon-
ed or unloaded so that power is not used for external or
ul work — used esp. of a motor, engine, pulley wheel
t 1 : to spend (as time) in idleness — often used with away
ng away a pleasant summer day⟩ 2 : to make or leave
⟨cutbacks in orders that idled thousands of workers⟩
common cold ~s more people than any other disease⟩
to cause to idle ⟨~ a motor⟩
\"\ n -s [²idle] : an act or instance or the state of idling
engine running at ~⟩
y n -s [¹idle + -by (as in the name Crosby)] obs : IDLER
eaded \ˈ··ˌ··\ adj 1 : FOOLISH, STUPID, SILLY 2 obs
it of one's head : DELIRIOUS, CRAZY
hood \ˈīdᵊlˌhu̇d\ n, archaic : IDLENESS
man \-ˌmən\ n, pl idlemen archaic : a man of substance
o does not need to work for a living
ness n -ES [ME idelnesse (also, vanity) fr. OE idelnes,
idel + -nes -ness] : the quality or state of being idle (as
ough lack of worth, occupation, employment, industry)
: ~ [illegible]our search⟩ ⟨increasing ~ in the auto industry⟩
per[illegible] unbelievable ~⟩; also : an instance of such
nes[illegible] yesterday's ~ forgotten⟩
\ˈīd(ᵊ)lə(r)\ n -s 1 : one that idles or is unoccupied
e that spends his time in inaction : a lazy person 2 a : IDLER
R b : IDLER PULLEY c : IDLER WHEEL 3 : a member of
hip's crew that has constant day duties and keeps no night
ch 4 : an empty railroad car placed between two cars
t support a load; also : an empty flatcar placed at either
of a loaded flatcar to take the overhang but not the weight
projecting load 5 : a member of a fish-dressing gang who
shes gutted fish or a wharf laborer who carries fish and
plies to the cleaners and removes scrap
r gear n 1 : a gear placed between a driving and a driven
r to transfer motion
hout change of direc-
n or gear ratio 2 : a
(or support or guid-



idly \ˈīd(ᵊ)lē, -li\ adv [ME idilly, fr. OE idellīce, fr. idel idle + -lice -ly — more at IDLE] : in an idle manner: as a : INEFFECTUALLY, VAINLY b : LAZILY, INDOLENTLY; broadly : without especial interest or effort : CASUALLY c obs : FOOLISHLY, INCOHERENTLY

ido \ˈē(ˌ)dō\ n -s cap [Esperanto, offspring, fr. Gk -idēs, patronymic suffix] : an international artificial language produced by modification of Esperanto

ido·crase \ˈīdōˌkrās, ˈid-, -āz\ n -s [F, fr. Gk eidos form, shape + krasis mixture, fr. kerannynai to mix — more at IDYLL, CRATER] : a mineral $Ca_{10}(Mg,Fe)_2Al_4Si_9O_{34}(OH)_4$ that is a complex silicate of calcium, magnesium, iron, and aluminum — called also vesuvianite

idol \ˈīdᵊl\ n -s often attrib [ME idel, idol, fr. OF idele, idle, idole, fr. LL idolum, fr. Gk eidōlon phantom, image, image of a god; akin to Gk eidos shape, form — more at WISE] 1 a : an image of a divinity : a representation or symbol of a deity or any other being or thing made or used as an object of worship; broadly : a false god : a heathen deity b : an image (as of a saint) used in Christian worship 2 a obs : an appearance, aspect, or likeness of something b obs : EFFIGY, STATUE c obs : PRETENDER, IMPOSTOR 3 : a form or appearance visible but without substance : an incorporeal image or phantom ⟨sense perception is explained, after the manner of Democritus, by ~s or images or thin filmlike forms, which emanate from the objects around us —Frank Thilly⟩ 4 : something or someone on which the affections are strongly and often excessively set : an object of passionate devotion : a person or thing greatly loved or adored 5 : a false notion or conception : FALLACY, IDOLUM 2

idol·a·ter \īˈdälәd·ə(r), -ətə- sometimes əˈdä-\ n -s [alter. (influenced by MF idolatre) of ME idolatrer, idolatrour, fr. MF idolatre (fr. LL idololatres, fr. Gk eidōlolatrēs, fr. eidōlon idol + -latrēs -later) + ME -er or -our -or — more at IDOL] 1 : a worshiper of idols : one that pays divine honors to an image, statue, or natural object as a representation of deity 2 : a person that devotes intense or excessive and often blind affection, adoration, or admiration to an object not normally or usu. a subject of worship ⟨no undiscriminating ~ of Great Britain —B.J.Hendrick⟩

idol·a·tress \-lәtrəs\ n -ES : a female idolater

idol·a·tric \(ˈ)īˌdäləˌ(ˌ)trik, ˌīdəˌla·tr-\ also **ido·lat·ri·cal** \ˌīdəˌla·trəkəl\ adj [ML idolatricus, fr. idolatria idolatry + L -icus -ic, -ical] : IDOLATROUS

idol·a·trize \īˈdäləˌtrīz sometimes əˈd-\ vb -ED/-ING/-S [idolatry + -ize] vi : to worship idols : pay idolatrous worship ~ vt : to make an idol of : IDOLIZE — **idol·a·triz·er** \-zə(r)\ n -s

idol·a·trous \(ˈ)īˌdäləˌtrəs sometimes əˈd-\ adj : of or relating to idolatry: as a : being or resembling idolatry ⟨~ veneration for antiquity⟩ b : given to or practicing idolatry ⟨an ~ worshiper⟩ — **idol·a·trous·ly** adv — **idol·a·trous·ness** n -ES

idol·a·try \-·lə·trē, -ri\ n -ES [ME idolatrie, fr. OF, fr. ML idolatria, alter. of LL idololatria, fr. Gk eidōlolatreia, fr. eidōlon + latreia -latry] 1 a : the worship of a physical object as a god; esp : such worship of a made image b : the giving of absolute religious devotion and ultimate trust to something that is not God 2 : immoderate attachment or devotion to or veneration for something : respect or love that approaches that due a divine power 3 obs : an object of idolatry

idol·ism \ˈīdᵊlˌizəm\ n -s 1 a : the worship of idols b : IDOLIZATION 2 : IDOLUM 2

idol·ist \-ᵊəst\ n -s archaic : IDOLATER 1

idol·i·za·tion \ˌīdᵊləˈzāshən, -ᵊlīˈz-\ n -s : the act of idolizing or state of being idolized ⟨the ~ to which they were subjected⟩

idol·ize \ˈīdᵊlˌīz\ vb -ED/-ING/-S see -ize in Explan Notes vt : to make an idol of : worship idolatrously; broadly : to love to excess : reverence to adoration ⟨~ gold⟩ ⟨boys at just the right age for idolizing military or sports heroes⟩ ~ vi : to practice idolatry — **idol·iz·er** \-zə(r)\ n -s

idolo- also **eidolo-** comb form [LL & Gk; LL idolo-, fr. Gk eidōlo-, fr. eidōlon — more at IDOL] : idol : image ⟨idolocracy⟩ ⟨idolomania⟩ ⟨idoloclastic⟩

idololatry n -ES [LL idololatria — more at IDOLATRY] obs : IDOLATRY

idol shepherd n : a counterfeit or worthless shepherd ⟨woe to the idol shepherd that leaveth the flock —Zech 11:17 (AV)⟩ — compare SHEPHERD 2

idols of the cave [trans. of NL idola specus] : idola due to individual peculiarities or prejudices — compare IDOLUM 2

idols of the forum or **idols of the market** [trans. of NL idola fori] : idola due to human factors (as language) — compare IDOLUM 2

idols of the theater [trans. of NL idola theatri] : idola due to traditional doctrines and methods — compare IDOLUM 2

idols of the tribe [trans. of NL idola tribus] : idola due to human nature itself or to the tribe or race of man (as anthropomorphic projections) — compare IDOLUM 2

ido·lum \īˈdōləm\ n, pl **ido·la** \-lə\ [in sense 1, fr. L & Gk; L, phantom, image, fr. Gk eidōlon phantom, image, idol; in sense 2, NL, fr. LL, idol, fr. Gk eidōlon — more at IDOL] 1 : EIDOLON 2 : a form of false thinking : FALLACY, IDOL 5; specif : one of the four varieties of fallacy distinguished by Francis Bacon in his Novum Organum (1620) — compare IDOLS OF THE CAVE, IDOLS OF THE FORUM, IDOLS OF THE THEATER, IDOLS OF THE TRIBE

ido·ne·i·ty \ˌīdəˈnēəd·ē\ n -ES [ML idoneitas, fr. L idoneus + -itas -ity] archaic : the quality or state of being idoneous : SUITABILITY, FITNESS

ido·ne·ous \(ˈ)īˈdōnēəs\ adj [L idoneus] archaic : FIT, APPROPRIATE, SUITABLE, PROPER

idos pl of IDO

idose \ˈīˌdōs, ˈiˌd- also -ōz\ n -s [ISV id- (fr. ISV idonic — acid — $C_6H_{12}O_7$, fr. L idem same + ISV gulonic) + -ose — more at IDENTITY] : a sugar $C_6H_{12}O_6$ epimeric with gulose and obtainable along with gulose by synthesis from xylose

ido·tea \īˈdōd·ēə\ [NL, irreg. fr. Gk Eidothea, a sea goddess] syn of IDOTHEA

idothea \īˈdōthēə, -däth-\ n, cap [NL, alter. of Idotea] : a large and widely distributed genus (the type of the family Idotheidae) of small marine cursorial isopods

i doubt it \ˈ·ˈ··\ n, cap first I : a card game in which each player tries to be first to empty his hand by laying down a number of cards and calling them the rank it is his turn to play (as two, ten, ace), discarding them if no one says "I doubt it" or if his claim is proved correct, but having to take up all discards on the table if it is shown that he included cards not called for

IDR abbr infantry drill regulations

id·ri·a·lite \ˈidrēəˌlīt\ n -s [F idrialite, fr. Idria (Idrija), Yugoslavia + F -lite] : a mineral prob. $C_{43}H_{32}O$ occurring as a crystalline hydrocarbon and melting at 205° C

-i·dro·sis \əˈdrōsəs\ n comb form, pl **-idro·ses** \-ōˌsēz\ [NL, fr. Gk -idrōsis, fr. hidrōsis act of sweating, fr. hidroun to sweat (fr. hidrōs sweat) + -sis — more at SWEAT] : a specified form of sweating ⟨chromidrosis⟩ ⟨bromidrosis⟩ ⟨hyperidrosis⟩

ids pl of ID

-ids pl of -ID

¹id·u·mae·an or **id·u·me·an** \ˌidyəˈmēən, ˌijəˈ-, ˌidəˈ-\ n -s usu cap [Idumaea or Idumea, ancient region south of the Dead sea in Palestine (fr. L Idumaea, fr. Gk Idoumaia) + E -an] : EDOMITE

or being an idyll 2 : pleasing or picturesque in its natural simplicity ⟨romantic memories of a lost cause threw an ~ haze over earlier times —V.L.Parrington⟩ — **idyl·li·cal·ly** \-lək(ə)lē, -lēk-, -li\ adv

idyll·ist \ˈīdᵊləst, chiefly Brit ˈid-\ n -s : a composer of idylls : an idyllic writer

idyl·li·um \īˈdilēəm, əˈd-\ also **idyl·li·on** \-ēˌän, -ēən\ n, pl **idyl·lia** \-ēə\ [L — more at IDYLL] archaic : IDYLL

ie \ˈēˌ(ˌ)ā\ or **ieie** \ˈē(ˌ)āˈē(ˌ)ā\ n -s [Hawaiian] 1 : a Pacific Islands screw pine (Freycinetia arborea) having prop roots which yield a fiber 2 : a mat or basket made of the fiber of the ie

-ie also **-y** or **-ey** \ē, i\ n suffix, pl **-ies** or **-eys** [ME (Sc) -ie] 1 a : little one : dear little one ⟨birdie⟩ ⟨bootie⟩ ⟨Jeanie⟩ b — in names of articles of feminine apparel ⟨nightie⟩ ⟨pantie⟩ 2 : one belonging to : one having to do with ⟨bookie⟩ ⟨deckie⟩ ⟨hackie⟩ ⟨townie⟩ 3 : one of (such) a kind or quality ⟨biggie⟩ ⟨cutie⟩ ⟨smartie⟩ ⟨toughie⟩ ⟨darkey⟩

ie \thad·ˈiz, -aˈtiz; (ˈ)īˈē\ abbr [L id est] that is

IE abbr or n -s : industrial engineer

IE abbr 1 Indo-European 2 initial equipment 3 inside edge

¹-ier — see ²-ER

²-ier comparative of -Y

³-ier \ˌi(ə)r, ˌiə\ n suffix -s [MF — more at -EER] : person belonging to, connected with, or engaged in ⟨cashier⟩ ⟨gondolier⟩

ier·oe \ˌēəˈrōi\ n -s [ScGael iarogh] Scot : a great-grandchild

-ies pl of -Y

-iest superlative of -Y

¹if \(ˌ)if, əf, f, chiefly dial (ˈ)ef\ conj [ME yif, if, fr. OE gif; akin to OFris jef, ef if, OS ef if, whether, OHG ibu, oba if, whether, Goth ibai whether, and perh. to L is he, that — more at ITERATE] 1 a : in the event that : in case ⟨~ the train is on time, we'll meet him⟩ ⟨the news ~ false will prove distressing⟩ b : allowing, conceding, or granting that ⟨~ he actually did commit the crime⟩ c : SUPPOSING ⟨~ the money were right here on the table, you couldn't count it⟩ d : so long as : on condition that ⟨~ any part of the plan succeeds, you will get the credit⟩ ⟨~ you can keep your head when all about are losing theirs —Rudyard Kipling⟩ 2 : WHETHER ⟨not knowing ~ the candidate had the necessary qualifications⟩ ⟨asked ~ the mail had come⟩ ⟨doubts ~ two and two make four —Matthew Prior⟩ 3 — used to introduce an exclamation expressing a wish ⟨~ it would only rain⟩ 4 : even though : although perhaps ⟨an interesting ~ untenable argument⟩ ⟨~ we are broke, still we got our money's worth⟩ — **if anything** adv : on the contrary even : perhaps even : possibly even ⟨despite reports, conditions had if anything worsened⟩ ⟨if anything you ought to apologize⟩

²if \ˈif\ n -s 1 : CONDITION ⟨an argument with too many ~s in it⟩ : STIPULATION ⟨a contract weakened by ~s⟩ 2 : SUPPOSITION ⟨a theory full of ~s⟩

IF abbr 1 in full 2 often not cap intermediate frequency 3 often not cap [L ipse fecit] he did it himself

ifa·fa lily \əˈfäfə-\ n, usu cap I [ifafa fr. native name in southern Africa] : a bulbous scapose southern African herb (Cyrtanthus mackenii) of the family Amaryllidaceae used as an ornamental and having linear leaves and drooping waxy whitish or yellowish flowers in a terminal umbel

if-bet \ˈ·ˌ·\ n : a bet placed with a bookmaker whereby a bettor has money on a horse in a subsequent race provided his horse in an earlier race wins

if-clause \ˈ·ˌ·\ n : a conditional clause — compare THEN-CLAUSE

ife \ˈēfə\ n -s [Pg, fr. native name in Angola] : a tropical African bowstring hemp (Sansevieria cylindrica) the cylindrical leaves of which yield a strong cordage fiber

-if·er·ous \ˈif(ə)rəs\ adj comb form [ME, fr. L -ifer (fr. -i- + -fer) & MF -ifere (fr. L -ifer) + ME -ous — more at -FER] : -FEROUS

IFF abbr or n -s [abbr. of identification, friend or foe] : the electronic equipment or the system used to identify approaching craft as friendly or hostile ⟨was identified by his IFF⟩

if·fen \ˈifən\ conj [by alter.] dial : IF

if·fy \ˈifē, -fi\ adj, sometimes -ER/-EST [²if + -y] : abounding in contingencies or unknown qualities or conditions : UNCERTAIN ⟨an ~ question⟩ ⟨some very ~ political steps —New Republic⟩

ifil var of IPIL

if money \ˈ·ˌ··\ n, pl **if moneys** or **if monies** : money from earnings on one race automatically applied to a subsequent race when an if-bet is placed

-i·form \əˌfȯrm, -ȯ(ə)m\ adj comb form [MF & L; MF -iforme, fr. L -iformis, fr. -i- + -formis -form] : -FORM

i formation n, cap I : an offensive football formation in which the quarterback, fullback, and one or both halfbacks line up behind the center and perpendicular to the line

-i·for·mes \əˈfȯrˌmēz, -ȯ(ə)ˌ-\ n pl comb form [NL, fr. L, masc. & fem. pl. of -iformis -iform] : ones having (such a) form — in taxonomic names of animals ⟨Anseriformes⟩

IFR abbr instrument flight rules

ifrit \ˈiˌfrēt, əˈf-\ n -s [Ar ʻifrit — more at AFREET] : AFREET

ifs pl of IF

if-then \ˈ·ˈ·\ adj : CONDITIONAL, HYPOTHETICAL ⟨an if-then proposition⟩

ifu·gao \ˌēfüˈgau̇\ n, pl **ifugao** or **ifugaos** usu cap [Sp, fr. a native name in the Philippines] 1 a : a people inhabiting northern Luzon, Philippines b : a member of such people 2 : the Austronesian language of the Ifugao people

-i·fy \əˌfī\ vb suffix -ED/-ING/-ES [ME -ifien, fr. OF -ifier, fr. L -ificare, fr. -i- + -ficare -fy] : -FY

IG abbr 1 inspector general 2 intendant-general

iga·la \ēˈgälə\ also **iga·ra** \-ärə\ n, pl **igala** or **igalas** also **igara** or **igaras** usu cap 1 : a Yoruba-speaking people on the Niger at its confluence with the Benue in Nigeria 2 : a member of the Igala people

ig·bira or **ig·ba·ra** \ˈigbərə\ n, pl **igbira** or **igbiras** or **igbara** or **igbaras** usu cap 1 : a Negro people of the Benue river region 2 : a member of the Igbira people

igbo usu cap, var of IBO

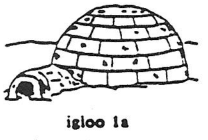
ig·dyr \igˈdi(ə)r\ n, pl **igdyr** or **igdyrs** usu cap 1 : a nomadic Turkoman people in Turkmenistan, Soviet Union, by the Caspian sea 2 : a member of the Igdyr people

-ig·er·ous \ˈij(ə)rəs\ adj comb form [L -iger (fr. -i- + -ger -gerous) + E -ous] : -GEROUS

igi·gi \ēˈjējē\ n pl [Assyr-Bab, fr. Sumerian] : a group of heavenly spirits under the god Anu in Babylonian religion

i girder n, cap I : I BEAM

ig·loo also **ig·lu** \ˈi(ˌ)glü\ n -s [Eskimo iglu, igdlu house] 1 a : an Eskimo house usu. made of sod, wood, or stone when permanent or of snow blocks in the shape of a dome when built for temporary purposes b : a building shaped like a dome: as (1) : a magazine for storing munitions (2) : a hut for housing poultry 2 : a cavity in the snow shaped like a dome and made by a seal over its breathing hole in the ice



igloo 1a

ign abbr 1 ignition 2 [L ignotus] unknown

ignaro n -s often cap [after Ignaro, character in The Faerie Queene by Edmund Spenser †1599 Eng. poet] obs : IGNORAMUS

ig·na·tia \igˈnāsh(ē)ə\ n -s [NL, fr. ignatii (specific epithet of Strychnos ignatii), after Saint Ignatius, 1st–2d cent. Christian

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WHAT IS SCIENTOLOGY?

The Comprehensive Reference on the World's Fastest Growing Religion

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7455

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The Creed of the Church of Scientology

The Creed of the Church of Scientology was written by L. Ron Hubbard shortly after the Church was formed in Los Angeles on February 18, 1954. After he issued this creed from his office in Phoenix, Arizona, the Church of Scientology adopted it as official because it succinctly states what Scientologists believe.

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We of the Church believe:

That all men of whatever race, color or creed were created with equal rights;

That all men have inalienable rights to their own religious practices and their performance;

That all men have inalienable rights to their own lives;

That all men have inalienable rights to their sanity;

That all men have inalienable rights to their own defense;

That all men have inalienable rights to conceive, choose, assist or support their own organizations, churches and governments;

That all men have inalienable rights to think freely, to talk freely, to write freely their own opinions and to counter or utter or write upon the opinions of others;

That all men have inalienable rights to the creation of their own kind;

That the souls of men have the rights of men;

That the study of the mind and the healing of mentally caused ills should not be alienated from religion or condoned in nonreligious fields;

And that no agency less than God has the power to suspend or set aside these rights, overtly or covertly.

And we of the Church believe:

That man is basically good;

That he is seeking to survive;

That his survival depends upon himself and upon his fellows and his attainment of brotherhood with the universe.

And we of the Church believe that the laws of God forbid man:

To destroy his own kind;

To destroy the sanity of another;

To destroy or enslave another's soul;

To destroy or reduce the survival of one's companions or one's group.

And we of the Church believe that the spirit can be saved and that the spirit alone may save or heal the body.

in may

Armstrong 3
PFL/DEFT EXHIBIT 3
WIT: Yanny
PENNY L. GILMORE, Reporter
7-12-94

REVISED BYLAWS

OF

CHURCH OF SCIENTOLOGY INTERNATIONAL

(A Nonprofit Religious Corporation formed and operated pursuant to the laws of the State of California)

PREAMBLE

The CHURCH OF SCIENTOLOGY INTERNATIONAL (hereinafter ferred to as "the corporation"), an association of persons ving incorporated exclusively for religious purposes under e laws of the State of California as the same relate to nprofit Religious Corporations, does by these Bylaws escribe the manner in which and the officers and agents whom such purposes shall be accomplished.

ARTICLE I

The Church

The corporation shall accomplish its purposes through nd by means of the operations and activities of a church nown as the "Church of Scientology International" and hereinafter referred to as "the Church".

The Church is the ecclesiastical "Mother Church" of he many churches within and without the United States which a been and will be organized for the purposes of the eligion of Scientology, all bound together as elements of

e. Minister to the spiritual needs of its staff and the clergy of Scientology Churches and Missions throughout the World through the conduct of religious services, both group and individual, and the provision of religious instruction to such persons and to Scientologists throughout the World.

Section 2. Mother Church. In addition to the foregoing, the Church, as the Mother Church, shall oversee and manage the ecclesiastical affairs of all other churches of Scientology to ensure and maintain the purity and integrity of the religion of Scientology. Further, the Church shall be responsible for the overall propagation of the religion of Scientology throughout the World and for the enforcement of the ecclesiastical tenets of the religion as set forth in e Scriptures. In managing the ecclesiastical affairs of all churches of Scientology, the Church shall have as its purpose the responsibility of keeping Scientology working (that is, getting the correct technology applied correctly).

ARTICLE IV

Creed

The Church subscribes, and its object is and purposes are that all of Mankind may subscribe to and practice the following Creed:

WE OF THE CHURCH BELIEVE:

That all men of whatever race, color or creed were eated with equal rights.

That all men have inalienable rights to their own religious practices and their performance.

That all men have inalienable rights to their own lives.

That all men have inalienable rights to their sanity.

That all men have inalienable rights to their own defense.

That all men have inalienable rights to conceive, choose, assist and support their own organizations, churches and governments.

That all men have inalienable rights to think freely, to talk freely, to write freely their own opinions and to counter or utter or write upon the opinions of others.

That all men have inalienable rights to the creation of their own kind.

That the souls of men have the rights of men.

That the study of the mind and the healing of mentally caused ills should not be alienated from religion or condoned in nonreligious fields.

And that no agency less than God has the power to suspend or set aside these rights, overtly or covertly.

AND WE OF THE CHURCH BELIEVE:

That man is basically good.

That he is seeking to survive.

That his survival depends upon himself and upon his fellows, and his attainment of brotherhood with the Universe.

AND WE OF THE CHURCH BELIEVE THAT THE LAWS OF GOD FORBID MAN:

To destroy his own kind

To destroy the sanity of another

To destroy or enslave another's soul

To destroy or reduce the survival of one's companions or one's group.

AND WE OF THE CHURCH BELIEVE:

That the spirit can be saved and

That the spirit alone may save or heal the body.

ARTICLE V

Membership

Section 1. Classification. The corporation shall have no members. It shall instead have parishioners who shall not be entitled to vote.

Section 2. Purpose of Affiliation. The Church believes that a person participating in the spiritual exercises of the Church may profit to such an extent that the person may become aware of his spiritual nature, capable of self determination, self discipline and a realization of his creative abilities; thus ordinary problems of life should be easily resolved or be of little or no concern. Therefore, such a person would be better able to contribute to the welfare of his fellow man, Society and the Nation. Such a state of Beingness of Mankind is the goal of the Church.

CERTIFICATION

I, the undersigned, do hereby certify:

1. That I am the duly elected and acting sistant Secretary of the Church of Scientology International, nonprofit religious corporation incorporated under the laws the State of California; and

2. That the foregoing Bylaws constitute the vised Bylaws of said corporation, as duly adopted by animous written consent of the Directors and Voting Members the corporation, dated as of the 20th day of May, 1982.

IN WITNESS WHEREOF, I have hereunto subscribed my name d affixed the seal of the said corporation, this 21st day of y, 1982.

Sandra Brennan

Assistant Secretary

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CERTIFICATE

I, Lynn R. Farny, hereby certify as follows:

1. That I am the duly elected and acting Secretary of Church of Scientology International, a nonprofit religious corporation incorporated under the laws of the State of California;

2. That the following amendement to Article VII, Section 2.a of the Bylaws of the corporation was duly adopted by unanimous written consent of the Board of Directors of the corporation on April 3, 1994:

> a. Election. Directors shall be elected by majority vote of the Trustees of the corporation. The Trustees shall elect one of the Directors as Chairman of the Board. Trustees may not cumulate votes in electing Directors. Regular elections of Directors shall be held at the annual meeting of the Trustees. Special elections may be held as necessary to fill vacancies on the Board of Directors. Only one Director may be elected from among the Trustees. Directors shall hold office for one year or until the next annual meeting of the Trustees, whichever period is shorter. Directors may be re-elected.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the seal of said corporation this 10th day of April, 1994.

Lynn R. Farny

Lynn R. Farny, Secretary

7464

The
Organization Executive Course

AN ENCYCLOPEDIA OF *SCIENTOLOGY®* POLICY

by

L. Ron Hubbard

BASIC STAFF VOLUME 0

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HCO POLICY LETTER OF 7 FEBRUARY 1965
REISSUED 27 AUGUST 1980
CORRECTED AND REISSUED 12 OCTOBER 1985

Remimeo
Sthil Students
Assn/Org Sec Hat
HCO Sec Hat
Case Sup Hat
Ds of P Hat
Ds of T Hat
Staff Member Hat
Franchise
(Issued May 1965)

(Reissued as the first issue in the
Keeping Scientology Working Series)

(Corrections in this type style)

Keeping Scientology Working Series 1

Note: Neglect of this Pol Ltr has caused great hardship on staffs, has cost countless millions and made it necessary in 1970 to engage in an all-out, international effort to restore basic Scientology over the world. Within 5 years after the issue of this PL, with me off the lines, violation had almost destroyed orgs. "Quickie grades" entered in and denied gain to tens of thousands of cases. Therefore actions which neglect or violate this policy letter are HIGH CRIMES resulting in Comm Evs on ADMINISTRATORS and EXECUTIVES. It is not "entirely a tech matter," as its neglect destroys orgs and caused a 2-year slump. IT IS THE BUSINESS OF EVERY STAFF MEMBER to enforce it.

SPECIAL MESSAGE

THE FOLLOWING POLICY LETTER MEANS WHAT IT SAYS.

IT WAS TRUE IN 1965 WHEN I WROTE IT. IT WAS TRUE IN 1970 WHEN I HAD IT REISSUED. I AM REISSUING IT NOW, IN 1980, TO AVOID AGAIN SLIPPING BACK INTO A PERIOD OF OMITTED AND QUICKIED FUNDAMENTAL GRADE CHART ACTIONS ON CASES, THEREBY DENYING GAINS AND THREATENING THE VIABILITY OF SCIENTOLOGY AND OF ORGS. SCIENTOLOGY WILL KEEP WORKING ONLY AS LONG AS *YOU* DO YOUR PART TO KEEP IT WORKING BY APPLYING THIS POLICY LETTER.

WHAT I SAY IN THESE PAGES HAS ALWAYS BEEN TRUE, IT HOLDS TRUE TODAY, IT WILL STILL HOLD TRUE IN THE YEAR 2000 AND IT WILL CONTINUE TO HOLD TRUE FROM THERE ON OUT.

NO MATTER WHERE YOU ARE IN SCIENTOLOGY, ON STAFF OR NOT, THIS POLICY LETTER HAS SOMETHING TO DO WITH YOU.

ALL LEVELS

KEEPING SCIENTOLOGY WORKING

HCO Sec or Communicator hat check
on all personnel and *all* new personnel
as taken on.

We have some time since passed the point of achieving uniformly workable technology.

The only thing now is getting the technology applied.

If you can't get the technology applied, then you can't deliver what's promised. It's as simple as that. If you can get the technology applied, you *can* deliver what's promised.

The only thing you can be upbraided for by students or pcs is "no results." Trouble spots occur only where there are "no results." Attacks from governments or monopolies occur only where there are "no results" or "bad results.".

Therefore the road before Scientology is clear and its ultimate success is assured *if* the technology is applied.

So it is the task of the Assn or Org Sec, the HCO Sec, the Case Supervisor, the D of P, the D of T and all staff members to get the correct technology applied.

Getting the correct technology applied consists of

One: Having the correct technology.

Two: Knowing the technology.

Three: Knowing it is correct.

Four: Teaching correctly the correct technology.

Five: Applying the technology.

Six: Seeing that the technology is correctly applied.

Seven: Hammering out of existence incorrect technology.

Eight: Knocking out incorrect applications.

Nine: Closing the door on any possibility of incorrect technology.

Ten: Closing the door on incorrect application.

One above has been done.

Two has been achieved by many.

Three is achieved by the individual applying the correct technology in a proper manner and observing that it works that way.

Four is being done daily successfully in most parts of the world.

Five is consistently accomplished daily.

Six is achieved by Instructors and Supervisors consistently.

Seven is done by a few but is a weak point.

Eight is not worked on hard enough.

Nine is impeded by the "reasonable" attitude of the not-quite-bright.

Ten is seldom done with enough ferocity.

Seven, Eight, Nine and Ten are the only places Scientology can bog down in any area.

The reasons for this are not hard to find. (a) A weak certainty that it works in Three above can lead to weakness in Seven, Eight, Nine and Ten. (b) Further, the not-too-bright have a bad point on the button Self-Importance. (c) The lower the IQ, the more the individual is shut off from the fruits of observation. (d) The service facs of people make them defend themselves against anything they confront, good or bad, and seek to make it wrong. (e) The bank seeks to knock out the good and perpetuate the bad.

Thus, we as Scientologists and as an organization must be very alert to Seven, Eight, Nine and Ten.

In all the years I have been engaged in research I have kept my comm lines wide open for research data. I once had the idea that a group could evolve truth. A third of a century has thoroughly disabused me of that idea. Willing as I was to accept suggestions and data, only a handful of suggestions (less than twenty) had long-run value and *none* were major or basic; and when I did accept major or basic suggestions and used them, we went astray and I repented and eventually had to "eat crow."

On the other hand there have been thousands and thousands of suggestions and writings which, if accepted and acted upon, would have resulted in the complete destruction of all our work as well as the sanity of pcs. So I know what a group of people will do and how insane they will go in accepting unworkable "technology." By actual record the percentages are about twenty to 100,000 that a group of human beings will dream up bad technology to destroy good technology. As we could have gotten along without suggestions, then, we had better steel ourselves to continue to do so now that we have made it. This point will, of course, be attacked as "unpopular," "egotistical" and "undemocratic." It very well may be. But it is also a survival point. And I don't see that popular measures, self-abnegation and democracy have done anything for Man but push him further into the mud. Currently, popularity endorses degraded novels, self-abnegation has filled the Southeast Asian jungles with stone idols and corpses, and democracy has given us inflation and income tax.

Our technology has not been discovered by a group. True, if the group had not supported me in many ways, I could not have discovered it either. But it remains that if in its formative stages it was not discovered by a group, then group efforts, one can safely assume, will not add to it or successfully alter it in the future. I can only say this now that it is done. There remains, of course, group tabulation or coordination of what has been done, which will be valuable—only so long as it does not seek to alter basic principles and successful applications.

The contributions that were worthwhile in this period of forming the technology were help in the form of friendship, of defense, of organization, of dissemination, of application, of advices on results and of finance. These were great contributions and were, and are, appreciated. Many thousands contributed in this way and made us what we are. Discovery contribution was not however part of the broad picture.

We will not speculate here on why this was so or how I came to rise above the bank. We are dealing only in facts and the above is a fact—the group left to its own devices would not have evolved Scientology but with wild *dramatizations* of the bank called "new ideas" would have wiped it out. Supporting this is the fact that Man has never before evolved workable mental technology and emphasizing it is the vicious technology he *did* evolve—psychiatry, psychology, surgery, shock treatment, whips, duress, punishment, etc., ad infinitum.

So realize that we have climbed out of the mud by whatever good luck and good sense, and *refuse* to sink back into it again. See that Seven, Eight, Nine and Ten above are ruthlessly followed and we will never be stopped. Relax them, get reasonable about it and we will perish.

So far, while keeping myself in complete communication with all suggestions, I have not failed on Seven, Eight, Nine and Ten in areas I could supervise closely. But it's not good enough for just myself and a few others to work at this.

Whenever this control as per Seven, Eight, Nine and Ten has been relaxed, the whole organizational area has failed. Witness Elizabeth, N.J.; Wichita; the early organizations and groups. They crashed only because I no longer did Seven, Eight, Nine and Ten. Then, when they were all messed up, you saw the obvious "reasons" for failure. But ahead of that they ceased to deliver and *that* involved them in other reasons.

The common denominator of a group is the reactive bank. Thetans without banks have different responses. They only have their banks in common. They agree then only on bank principles. Person to person the bank is identical. So constructive ideas are *individual* and seldom get broad agreement in a human group. An individual must rise *above* an avid craving for agreement from a humanoid group to get anything decent done. The bank-agreement has been what has made Earth a Hell—and if you were looking for Hell and found Earth, it would certainly serve. War, famine, agony and disease has been the lot of Man. Right now the great governments of Earth have developed the means of frying every Man, Woman and Child on the planet. That is bank. That is the result of Collective-thought Agreement. The decent, pleasant things on this planet come from *individual* actions and ideas that have somehow gotten by the Group Idea. For that matter, look how we ourselves are attacked by "public opinion" media. Yet there is no more ethical group on this planet than ourselves.

Thus each one of us can rise above the domination of the bank and then, as a group of freed beings, achieve freedom and reason. It is only the aberrated group, the mob, that is destructive.

When you don't do Seven, Eight, Nine and Ten actively, you are working for the bank-dominated mob. For it will surely, surely (a) introduce incorrect technology and swear by it, (b) apply technology as incorrectly as possible, (c) open the door to any destructive idea, and (d) encourage incorrect application.

It's the bank that says the group is all and the individual nothing. It's the bank that says we must fail.

So just don't play that game. Do Seven, Eight, Nine and Ten and you will knock out of your road all the future thorns.

Here's an actual example in which a senior executive had to interfere because of a pc spin: A Case Supervisor told Instructor A to have Auditor B run Process X on Preclear C. Auditor B afterwards told Instructor A that "It didn't work." Instructor A was weak on Three above and didn't really believe in Seven, Eight, Nine and Ten. So Instructor A told the Case Supervisor, "Process X didn't work on Preclear C." Now *this* strikes directly at each of One to Six above in Preclear C, Auditor B, Instructor A *and* the Case Supervisor. It opens the door to the introduction of "new technology" and to failure.

What happened here? Instructor A didn't jump down Auditor B's throat, that's all that happened. This is what he *should* have done: Grabbed the Auditor's Report and looked it over. When a higher executive on this case did so, she found what the Case Supervisor and the rest missed: that Process X *increased* Preclear C's TA to 25 TA divisions for the session but that near session end Auditor B Q'd and A'd with a cognition and abandoned Process X while it still gave high TA and went off running one of Auditor B's own manufacture, which nearly spun Preclear C. Auditor B's IQ on examination turned out to be about 75. Instructor A was found to have huge ideas of how you must never invalidate anyone, even a lunatic. The Case Supervisor was found to be "too busy with admin to have any time for actual cases."

All right, there's an all-too-typical example. The *Instructor* should have done Seven, Eight, Nine and Ten. This would have begun this way. Auditor B: "That Process X didn't work." Instructor A: "What exactly did *you* do wrong?" Instant attack. "Where's your Auditor's Report for the session? Good. Look here, you were getting a lot of TA when you stopped Process X. What did you do?" Then the pc wouldn't have come close to a spin and all four of these would have retained *their* certainty.

In a year, I had four instances in *one* small group where the correct process recommended was reported not to have worked. But on review found that each one had (a) increased the TA, (b) had been abandoned, and (c) had been falsely reported as unworkable. Also, despite this abuse, in each of these four cases the recommended, correct process cracked the case. Yet they were reported as *not having worked!*

Similar examples exist in instruction and these are all the more deadly as every time instruction in correct technology is flubbed, then the resulting error, uncorrected in the auditor, is perpetuated on every pc that auditor audits thereafter. So Seven, Eight, Nine and Ten are even more important in a course than in supervision of cases.

Here's an example: A rave recommendation is given a graduating student "because he gets more TA on pcs than any other student on the course!" Figures of 435 TA divisions a session are reported. "Of course his Model Session is poor but it's just a knack he has" is also included in the recommendation. A careful review is undertaken because *nobody* at Levels O to IV is going to get that much TA on pcs. It is found that this student was never taught to read an E-Meter TA dial! And no Instructor observed his handling of a meter and it was not discovered that he "overcompensated" nervously, swinging the TA 2 or 3 divisions beyond where it needed to go to place the needle at "set." So everyone was about to throw away standard processes and Model Session because this one student "got such remarkable TA." They only read the reports and listened to the brags and never *looked* at this student. The pcs in actual fact were making slightly less than average gain, impeded by a rough Model Session and misworded processes. Thus, what was making the pcs win (actual Scientology) was hidden under a lot of departures and errors.

I recall one student who was squirreling on an Academy course and running a lot of offbeat whole track on other students after course hours. The Academy students were in a state of electrification on all these new experiences and weren't quickly brought under control, and the student himself never was given the works on Seven, Eight, Nine and Ten so they stuck. Subsequently, this student prevented another squirrel from being straightened out and his wife died of cancer resulting from physical abuse. A hard, tough instructor at that moment could have salvaged two squirrels and saved the life of a girl. But no, students had a right to do whatever they pleased.

Squirreling (going off into weird practices or altering Scientology) only comes about from noncomprehension. Usually the noncomprehension is not of Scientology but some earlier contact with an offbeat humanoid practice which in its turn was not understood.

When people can't get results from *what they think* is standard practice, they can be counted upon to squirrel to some degree. The most trouble in the past two years came from orgs where an executive in each *could not* assimilate straight Scientology. Under instruction in Scientology, they were unable to define terms or demonstrate examples of principles. And the orgs where they were got into plenty of trouble. And worse, it could not be straightened out easily because neither one of these people could or would duplicate instructions. Hence, a debacle resulted in two places, directly traced to failures of instruction earlier. So proper instruction is vital. The D of T and his Instructors and all Scientology Instructors must be merciless in getting Four, Seven, Eight, Nine and Ten into effective action. That one student, dumb and impossible though he may seem and of no use to anyone, may yet someday be the cause of untold upset because nobody was interested enough to make *sure* Scientology got home to him.

With what we know now, there is no student we enroll who cannot be properly trained. As an Instructor, one should be very alert to slow progress and should turn the sluggards inside out personally. No *system* will do it, only you or me with our sleeves rolled up can crack the back of bad studenting and we can only do it on an individual student, never on a whole class only. He's slow = something is awful wrong. Take *fast* action to correct it. Don't wait until next week. By then he's got other messes stuck to him. If you can't graduate them with their good sense appealed to and wisdom shining, graduate them in such a state of shock they'll have nightmares if they contemplate squirreling. Then experience will gradually bring about Three in them and they'll *know* better than to chase butterflies when they should be auditing.

When somebody enrolls, consider he or she has joined up for the duration of the universe—never permit an "open-minded" approach. If they're going to quit let them quit fast. If they enrolled, they're aboard; and if they're aboard, they're here on the same terms as the rest of us—win or die in the attempt. Never let them be half-minded about being Scientologists. The finest organizations in history have been tough, dedicated organizations. Not one namby-pamby bunch of panty-waist dilettantes have ever made anything. It's a tough universe. The social veneer makes it seem mild. But only the tigers survive—and even *they* have a hard time. We'll survive because we are tough and are dedicated. When we *do* instruct somebody properly, he becomes more and more tiger. When we instruct half-mindedly and are afraid to offend, scared to enforce, we don't make students into good Scientologists and that lets everybody down. When Mrs. Pattycake comes to us to be taught, turn that wandering doubt in her eye into a fixed, dedicated glare and she'll win and we'll all win. Humor her and we all die a little. The proper instruction attitude is "You're here so you're a Scientologist. Now we're going to make you into an expert auditor no matter what happens. We'd rather have you dead than incapable."

Fit that into the economics of the situation and lack of adequate time and you see the cross we have to bear.

But we won't have to bear it forever. The bigger we get, the more economics and time we will have to do our job. And the only things which can prevent us from getting that big fast are areas in from One to Ten. Keep those in mind and we'll be able to grow. Fast. And as we grow, our shackles will be less and less. Failing to keep One to Ten will make *us* grow less.

So the ogre which might eat us up is not the government or the High Priests. It's our possible failure to retain and practice our technology.

An Instructor or Supervisor or Executive *must* challenge with ferocity instances of "unworkability." They must uncover what *did* happen, what *was* run and what *was* done or not done.

If you have One and Two, you can only acquire Three for all by making sure of all the rest.

We're not playing some minor game in Scientology. It isn't cute or something to do for lack of something better.

The whole agonized future of this planet, every Man, Woman and Child on it, and your own destiny for the next endless trillions of years depend on what you do here and now with and in Scientology.

This is a deadly serious activity. And if we miss getting out of the trap now, we may never again have another chance.

Remember, this is our first chance to do so in all the endless trillions of years of the past. Don't muff it now because it seems unpleasant or unsocial to do Seven, Eight, Nine and Ten.

Do them and we'll win.

L. RON HUBBARD
Founder

Adopted as official
Church policy by
CHURCH OF SCIENTOLOGY
INTERNATIONAL

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Declaration of Gerald Armstrong

I, Gerald Armstrong, declare:

1. I have been advised by torney Joseph A. Yanny that e has been sued by one or ore Scientology entities, hereinafter eferred to as "the organization," or inducing me to breach a ettlement agreement I entered into with the organization in December 1986. I am making this declaration to show that this allegation is in every respect untrue.

2. I received a telephone call from Mr. Yanny to my answering machine on or about July 10, 1991. He left a message which simply said, "I need your help." I

DEPOSITION
EXHIBIT
7

called him back at which time he reiterated his request for my help and explained that because of organization machinations (which have been detailed in other declarations by other parties), Rick and Vicki Aznaran, plaintiffs and counter-defendants against the organization had been induced to fire their attorney, Ford Greene, and that Mr. Yanny had come into the case to ensure they had legal representation. Mr. Yanny also expressed during this conversation some personal concerns, which will remain private and confidential between Mr. Yanny and me.

3. I told Mr. Yanny at that time that I would help and that I would travel to Los Angeles on July 12. I asked him for five hundred dollars to cover my expenses and told him he could consider it as purchase of stock in the Gerald Armstrong Corporation (TGAC). I also counseled Mr. Yanny at that time regarding his personal spiritual difficulties. (TGAC is a California Corporation in which, although it bears my name and I am its active officer,

I own no stock.)

4. I did travel to Los Angeles, did stay at Mr. Yanny's home, did work in his office on July 15 and 16, and did write and execute a declaration on July 16 giving my knowledge of the effect of the December 1986 group settlement agreements on the ability of the Aznarans and other individuals victimized by the organization to obtain proper legal representation. I also discussed with Mr. Yanny literary and

artistic matters, areas of the law, as a copyright and trademark attorney, in wh he has expertise. The majority of my time with Mr. Yanny concerned spiritual matters, an area in which I have expertise.

5. I refer this Court to my declarations of March 15, 1990 and December 25, 1990, and the exhibits thereto. These declarations detail the circumstances at the time of the December 1986 settlement and the many instances subsequently

when I was attacked
or threatened by the
organization in violation
of the settlement agreements
these declarations make it
very clear that I consider
I have a right to counter
the organization's attacks,
to speak out against
its policy of "fair game"
and assaults on the
basic rights of individuals,
and to assist those
whom I would depend
on for protection against
the organization's legal
and extra-legal might
and antisocial acts.
It is therefore the org-

anization itself which induced me. if I was induced by any human agency to do anything which the organization might consider a breach of the settlement agreement.

6. But more than a desire to protect myself or right the organization's unjust acts towards me, however, I helped Mr. Yanny for the simple reason that he asked. I will do the same for anyone. The organization is aware of this fact because it received my letter of

June 21, 1991, a copy of which will accompany this declaration as Exhibit 1, and acknowledged the letter's receipt in their letter of July 3, 1991, a copy of which will accompany this declaration as Exhibit 2. It is not only the right of all men to respond to requests for help, it is our essence. If I was induced, therefore, to help Mr. Jonny, or anyone else, it was our Creator Who induced me. Mr. Jonny, unlike the organization, was not aware of my dedication to helping my fellow humans, did not know of my June

21, 1991 letter, so acted in innocence.

7. I do not ask for or expect a fee for my help, although generally I do not refuse whatever is given me. I know that I am sustained completely by the Great Coordinator Who sends to me whomever He wants me to help. I therefore cannot be induced by money or whatever anyone can offer me.

I declare under the pain and penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 19th day of July at New York, New York.

G.

Gerald Armstrong

June 21, 1991

Eric M. Lieberman, Esq.
Rabinowitz, Boudin, etc.
740 Broadway, Fifth floor
New York, NY 10003

Via Federal Express

Dear Mr. Lieberman:

I received a call yesterday from Malcolm Hothling, the plaintiff in a defamation case against the organization in South Africa. He asked me to testify at the trial in early August.

After listening to his story and his understanding of organization philosophy and practises I agreed. I said, however, that I would first attempt to bring about a peaceful resolution of the Scientology conflict. Hence I'm writing you.

You will receive a photocopy of this letter because the original of my significant holographs are the property of a third party corporation by contract. I will, nevertheless, sign the photocopy, not so much because you or the organization representatives might doubt that I am the writer, but to add fifteen dollars to the value of your archive.

And all of that is just another way of saying that serious matters are nothing to lose a sense of humor over.

I am certain that the Nothling matter

can be resolved easily with the following organizational actions:

1. A sincere public apology for its "declare" and other antisocial acts.

2. A sincere, public and complete repudiation of "“fair” game," philosophy of attack, vengeance and hatred, and elimination from Scientology literature of all policies advocating such philosophy.

3. Monetary settlement.

Mr. Nothling says he has no hope that the organization would do any of 1-3; and I recognize that it has exhibited no sign of rethinking its antisocial philosophy and practises. I also recognize that someday it will, and I do what I do because I believe it can be without, and not compelled by, a great human tragedy.

Thus far the organization has attempted to solve its problems with aggrieved individuals with mere monetary settlements and the occasional insicere announcement; e.g., Hubbard's famous elimination of the term "fair game," because it "causes bad PR," or the more recent blaming of the GO for all things bad and bastardly. And so the organization has brought upon itself more problems and made more aggrieved individuals who seek sincerity but end up taking insincerity and money.

Because I will go wherever my help is ~~askef~~ asked for I will continue until the organization sincerely denounces "fair" "game" in all its forms, or kills me. It should be understood that I have many things to do in my work, far more important than the application of ethics to the organization of Scientology. I do this because it is asked of me by those aggrieved. When there are no longer any aggrieved asking for my help I will do something else. Clearly there are others aggrieved by other organizations or nations who can use my help. They simply have not asked for it. It may be that the Scientology issue must be resolved in my life before I am called to help the others. I am not, and I'm sure you're also not, unaware that the organization has used my willingness to respond to requests for my help to entrap me and attack me. The only observable effect of the organization's ops and web of deceit has been an increasing willingness to help those likewise aggrieved by them.

I truly believe that the organization's problems can be easily eliminated. It can only be done philosophically; and since its philosophy contains within it the philosophical idea that its philosophy cannot be changed, it continues to appear that nothing can be done. that fact does not make a philosophic shift difficult, it simply means that it's a pretty silly philosophy.

Hubbard didn't have any original ideas just because there are ~~or~~ no original ideas. There are only two ideas and Hubbard chose the least effective and most boring of the two; the same idea which prevails in society. He wasn't worse than everyone else; he was the same. Scientology, by espousing the same idea as Hubbard and everyone else is ineffective and boring.

The real opposition is to Scientology's insistence that it is a religion. It isn't. It could be, but it isn't. And it isn't no matter what any government says it is, or any court or any lawyer. Almost the last people you'd want determining what is or is not a religion are judges and lawyers, since their profession depends on conflict, which within a religion cannot exist.

Among all human activities there is only one which is religious — forgiveness. And that, technically, and in every sense, in the recognition that what needs to be forgiven didn't happen. It is somewhat difficult, of course, for the organization, which uses peoples' pasts against them, to understand this simple fact.

I am certain that Hubbard caught a glimmer of this understanding, but did not triumph over his fear so chose instead of forgiveness, condemnation. There is nothing within that

(B)

choice which threatens reality, or for which Hubbard should be condemned. It is merely not religion.

All of the things the organization does can be done by non-religious organizations or individuals. But forgiveness can only be done by the religious. Scientology, by publishing and defending its policy of unforgiveness; i.e., "fair game," "attack the attacker," SP declares, sec checks, lower conditions, etc., etc., is not to be condemned;

it is to be forgiven; but it is not a religion.

A church's only function is forgiveness and sanctuary. Since Scientology collects the facts of its members' past, for control, or any purpose, it is not a church. The lawyers and courts may call it a church, but it is like any non-church organization; e.g., KGB, ~~zo~~ republican party, etc. A church to be a church cannot maintain a cause of action. Others, carrying out their purpose, might choose to defend it, but a church, to be a church, would not defend itself. Of course, an organization with a stated senior policy that the best defense is attack, cannot be a church.

The world would welcome Scientology's doing something effective, yet condemnation, attack and hatred are without effect, and so the world continues to wait. And the Scientologists continue the boredom of unforgiving

lives, and the lawyers
and the few in control
get rich and stay bored.
And yes there are un-
forgiving and bored on
both sides. But the
forgiving are on no side.
And I go where I'm asked
to help. You haven't
asked but I hope this
helps anyway.

Mr. Rothling will call
me in about a week.
I'll be reachable until
then at (604) 795-5852.

I believe you understand whence I come, and I believe someone can do something.

Very truly yours,

G.

DEPT. 86

7499

SUPERIOR COURT OF CALIFORNIA , COUNTY OF LOS ANGELES

Date: July 29, 1994

Honorable DIANE WAYNE , Judge | I.R. MATTHEWS-DOTY , Deputy Clerk

#2 NONE , Deputy Sheriff | NONE , E.R.M.

BC052395

(Parties and Counsel checked if present)

CHURCH OF SCIENTOLOGY INTERNATIONAL, ETC., ET AL

Counsel For Plaintiff

vs

no appearances

Counsel For Defendant

GERALD ARMSTRONG, ET AL

NATURE OF PROCEEDINGS:

RECEIVED

AUG 03 1994

HUB LAW OFFICES

RULING ON MATTER TAKEN UNDER SUBMISSION JULY 28, 1994

The Court, on 7-28-94, having taken plaintiff's OSC re contempt under submission now rules as follows on the matter submitted:

OSC for Contempt: Deny

This court finds that there was a valid order issued on May 28, 1992 (hereinafter referred to as the "Order") pursuant to the opinion of the Court of Appeals, Second Appellate District, May 16, 1994. Pursuant to stipulation the defendant was properly served with the order and had the ability to comply with the order.

The request for contempt concerns three areas of activity alleged to have been engaged in by the Respondent; (1) the Aznaran, litigation, (2) the Wollersheim litigation; and (3) the Roberts litigation. This court finds that Moving Party had not demonstrated beyond a reasonable doubt that the Responding Party has violated the Order.

1. **The Aznaran Litigation**

Moving party argues that based on deposition testimony of Respondent (Ex. 14), he has violated the Order by assisting in a lawsuit against the Church of Scientology prosecuted by the Aznarans. In that testimony taken on October 8, 1992 Respondent indicates that he had conversations with the Aznarans regarding their case after the date of the Order.

However, no where is it suggested that any of those conversations were for the purposes of "assisting" in their claims. And, it appears that any such conversation could have been associated with his ministerial duties as a paralegal in the office of his employer. It should be noted that the Order specifically permits Respondent to engage in such employment and does **not** "wall" him off from all such litigation.

DEPT. 86

SUPERIOR COURT OF CALIFORNIA , COUNTY OF LOS ANGELES 7500

Date: July 29, 1994
Honorable DIANE WAYNE , Judge | I.R. MATTHEWS-DOTY , Deputy Clerk
#2b NONE , Deputy Sheriff | NONE , E.R.M.

BC052395 (Parties and Counsel checked if present)

CHURCH OF SCIENTOLOGY INTERNATIONAL,
ETC., ET AL

Counsel For
Plaintiff

vs

no appearances

Counsel For
Defendant

GERALD ARMSTRONG, ET AL

NATURE OF PROCEEDINGS:

Laurie Bartilson, an attorney for Moving Party, also testified that in July 1992 she received a telephone call from Respondent in relation to a Change of Venue order in the Aznaran litigation. She testified that during that conversation Respondent indicated that he was assisting the Aznarans in the litigation. However, court documents conclusively demonstrate that the venue order was not granted until August 28, 1992 suggesting that her recollection of the conversation was flawed.

2. **The Wollersheim Litigation**

Moving party argues that the affidavit submitted in the Wollersheim litigation violated the Order. Ex. 19. Clearly it would be impermissible for Respondent to have participated in that litigation if Wollersheim had been the prosecuting party. However, in the litigation in which the affidavit was used, the Church of Scientology was the plaintiff and Wollersheim was the defendant. This did not violated the prohibition of assisting in a claim "against" the church.

3. **The Roberts Litigation**

As demonstrated by Ex. 11 and 12 Respondent participated in the Roberts litigation to the extent that he executed two proofs of service in that matter. Such conduct was ministerial in nature and does not violate the prohibition against assisting in litigation.

Moving party also suggests that the Order was violated by conversations Respondent had with Roberts regarding his case. Ex. 8 and the deposition of October 8, 1992. However, it appears that those conversations took place prior to the Order.

And finally, when read in its totality, the letter of December 22, 1992 (Ex.9) does not amount to activity which "assists" in litigation on behalf of Roberts.

DEPT. 86

SUPERIOR COURT OF CALIFORNIA , COUNTY OF LOS ANGELES 7501

Date: July 29, 1994
Honorable DIANE WAYNE , Judge
I.R. MATTHEWS-DOTY , Deputy Clerk
12c NONE , Deputy Sheriff
NONE , E.R.M.

BC052395 (Parties and Counsel checked if present)

CHURCH OF SCIENTOLOGY INTERNATIONAL,
ETC., ET AL

Counsel For Plaintiff

vs

no appearances

Counsel For Defendant

GERALD ARMSTRONG, ET AL

NATURE OF PROCEEDINGS:

The OSC and the Citee, Gerald Armstrong, are discharged.

A copy of this minute order is sent to counsel appearing 7-28-94 via U.S. Mail addressed as follows:

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HUBBARD COMMUNICATIONS OFFICE
Saint Hill Manor, East Grinstead, Sussex

OT VIII

HCO BULLETIN OF 1 OCTOBER 1969

SECRET

WHY THETANS MOCK UP

This question has been the most plaguing one in Dianetics and Scientology.

The ONLY way a thetan ever gets in trouble, the ONLY way he can get trapped or become part of a cluster is by mocking up and making pictures of bad experiences.

And why record all bad experiences? This too is not good sense.

One can explain it by a yearning for event, by havingness and other ways but these do not factually lead to a total solution.

The real reason stems from a characteristic of a thetan. He never totally gives up.

There is, seemingly, a streak of resistance or resentment that makes a thetan wish to persist in the same place. If he cannot, he will do so covertly.

All power comes from the ability to occupy a point. The base that separates two terminals must be firm or there will be no exchange of energy.

The effort to weaken a thetan is to make him relinquish his point in space. Covertly or overtly a thetan seeks to assert his position in space.

If he cannot do so overtly, he does so covertly.

When a thetan is moved unwillingly from a point or position he even then refuses to give up that point but MOCKS IT UP. He also mocks up the events of his departure as a part of the action of mocking up the point he is leaving. This, unwittingly, gives him a picture, an engram.

Now let us see if this theory holds true in practice.

A. Just ahead of any engram there must be an effort to retain a position and there must be a point or location being mocked up.

This is true. You can blow an engram without running it by spotting its first point in space and time. In a secondary, "where did you first hear of the loss" is a vital question.

B. In a contact assist getting a person to touch again the point where he was hurt with what was hurt will blow the engram.

C. Getting a person to locate areas (locations) that are not safe produces blows of engrams without running them.

D. Exact and accurate dating sometimes blows an engram. Those times when it does not it should blow when the location is exactly spotted.

E. Implants and traps were done mainly to keep thetans out of an area. The thetan, resenting and resisting mocks up the place anyway and so implants himself.

A thetan too easily substitutes a mock up for a point in the real universe.

One could also say that a thetan, by mocking up, warns himself against certain points in space or areas in the physical universe.

Anxiety is solely not being able to be certain places and not where one is either.

Making people leave is the most unpopular action unless one also frees them to be anywhere.

Transfering people is a degrading thing to do to them.

Jail denies a thetan all spaces except where he has been placed and note that thetans are made very miserable in jail. Jailing is a sure way to confirm criminals and also to make them crazy as well.

Any thetan, stuck in an engram, is asserting the effort to be at the point where he was hit at the beginning of that engram.

An engram therefore is a refusal to leave a place at which force was exerted to drive one away.

Reversely, one can refuse to be held at a place where one does not wish to be but this is a negation of a place, a not-is of it and its time.

Power of choice over where one is and where one is not is thus a key to engrams.

Finally - a thetan mocks up because he covertly refuses to abandon a location under duress and not-ises the place where he does not wish to be but must.

Using these facts one can blow engrams without running them.

Some sample questions:

What point (location) is unsafe?

What location could you have held absolutely?

Where did you first get an intimation of danger?

What place would you rather not be in?

What effort would it take to hold (that) (a) location?

Working with this you will see a door open to a higher level than Dianetic R3R. But realize that it is only for a high level thetan.

This is the road to returned personal power in the physical unverse.

L. RON HUBBARD
FOUNDER

LRF:rs

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ORIGINAL

FILED

SEP 18 1995

HOWARD HANSON
MARIN COUNTY CLERK
By L. Steele, Deputy

7505

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450
In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive, Defendants.	No. 157 680 **EVIDENCE IN SUPPORT OF OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT** Date: 9/29/95 Time: 9:00 a.m. Dept: One Trial Date: Not Set

VOLUME VII

7506

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California State Bar No. 107601
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Attorney for Defendant
GERALD ARMSTRONG

ORIGINAL FILED
FEB [illegible]
[illegible]
SUPERIOR COURT

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation;

Plaintiffs,

vs.

GERALD ARMSTRONG; DOES 1 through 25, inclusive,

Defendants.

No. **152 229**

DECLARATION OF GARRY L. SCARFF IN OPPOSITION TO ORDER TO SHOW CAUSE RE CONTEMPT

Date: March 2, 1993
Time: 8:30 a.m.
Dept: 86

Trial Date: May 3, 1993
Discovery Cut Off: None Set
Motion Cut Off: None Set

RECEIVED
FEB 15 1993
HUB LAW OFFICES

COPY

7507

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Attorney for Defendant
GERALD ARMSTRONG

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation;

Plaintiffs,

vs.

GERALD ARMSTRONG; DOES 1 through 25, inclusive,

Defendants.

No. BC 052395

DECLARATION OF GARRY L. SCARFF IN SUPPORT OF OPPOSITION TO MOTION TO COMPEL

Date: February 19, 1993
Time: 8:30 a.m.
Dept: 30

Trial Date: May 3, 1992
Discovery Cut-Off: None
Motion Cut-Off: None

GARRY L. SCARFF declares:

1. My name is GARRY L. SCARFF. I live at 2137 N.E. Weidler St., Portland, Oregon 97232. My telephone number is (503) 281-9088. I am above the age of eighteen years old and provide the following testimony of my own first-hand knowledge. I could and would provide the same testimony in open court were I required to do so.

2. From 1982 through August 1992, I was a member of the CHURCH OF SCIENTOLOGY. For the two years preceding 1992 I was an operative of SCIENTOLOGY in the Los Angeles area where I have

worked closely with EUGENE INGRAM, a licensed private investigator whose income is solely derived from SCIENTOLOGY.

3. EUGENE INGRAM, at the direction of SCIENTOLOGY, has attempted to ruin FORD GREENE on a personal and professional basis because of his activities on behalf of the Cult Awareness Network, his outspoken and public criticism of SCIENTOLOGY, his representation of former Scientologists, particularly Richard and Vicki Aznaran, and his current working relationship with GERALD ARMSTRONG, a former high-ranking Scientologist.

4. The operations against FORD GREENE are coordinated through the CHURCH OF SCIENTOLOGY INTERNATIONAL in Los Angeles. In this regard, I knew that the person who directed and controlled these operations was DAVID MISCAVIGE, the head of Scientology.

5. In 1987 I was directed by SCIENTOLOGY to represent myself as a survivor of the People's Temple immolation in Jonestown, Guyana and befriend FORD GREENE in order to perpetrate a Scientology operation on him. During Christmas 1987 FORD invited me to spend the holiday with him. When I was in his office alone during that period of time, I availed myself of his confidential legal records, legal files of his clients, a rolodex of his contacts and photographed his office.

6. In approximately September 1991 at a McDonald's Restaurant located in Albany, Oregon, EUGENE INGRAM showed me a letter to the Federal Bureau of Investigation which I read. The letter from INGRAM stated that FORD GREENE was involved in the trafficking of drugs and the misuse of his law office by trading homosexual favors for the rendering of legal services. INGRAM frequently discussed his desire to have FORD GREENE indicted under

the RICO statutes.

7. On or about December 20, 1991, I attended a meeting at SCIENTOLOGY's OFFICE OF SPECIAL AFFAIRS in Los Angeles where the law offices of BOWLES and MOXON are located. Present at that meeting were the following individuals: KENDRICK MOXON, TIMOTHY BOWLES, RANDY SPENCER and ERIC MORAN, all of whom are attorneys at Scientology's in-house law firm, BOWLES AND MOXON. Also present were EUGENE INGRAM, and DAVID BUTTERWORTH, the director of Scientology's OFFICE OF SPECIAL AFFAIRS. One purpose of this meeting was to develop a plan to destroy the personal and professional credibility of FORD GREENE and to continue attempts to have him disbarred from practicing law because he represented litigants against SCIENTOLOGY.

The operations that were proposed and developed at this meeting included the following:

a. To create a public scheme portraying FORD GREENE as a sex fiend. This was to be accomplished through EUGENE INGRAM's manipulation of Margery Wakefield, a former client of FORD GREENE with a history of mental instability. INGRAM was to go to Florida and dupe Ms. Wakefield into signing a declaration that would be detrimental to FORD GREENE.

b. INGRAM asked me to execute a declaration stating that when I stayed with FORD GREENE over the Christmas holidays in 1987 Ford induced me to get drunk on alcohol and stoned on marijuana at which time INGRAM told me to state that FORD sodomized me and forced me to orally copulate him. INGRAM also told me to state that I did not admit to this in an earlier (false) declaration because FORD was to have threatened to send his drug dealer contacts to kill me if I stated anything of the homosexual attack.

c. INGRAM also wanted me to swear that FORD GREENE was a paying and frequent patron of a San Francisco bathhouse, that FORD GREENE was infected with the AIDS virus, and was intentionally passing it to others.

d. INGRAM also sought to expand on what he called the "fuck buddy" relationship between FORD GREENE and GERALD ARMSTRONG. One of INGRAM's suggestions was to set FORD GREENE up with a new male client who then would provide a declaration swearing that GREENE agreed to barter his legal services in return for sex.

e. Another of INGRAM's suggestions was that I go to San Anselmo and break into and enter GREENE's office when he was not present and plant cocaine and child pornography in his desk and then advise the police of GREENE's illegal possessions.

f. Ingram also suggested tampering with FORD GREENE's automobile by severing its brakes lines in order to produce a serious accident. When I said to Ingram that it could also kill GREENE, INGRAM responded, "There's no loss in a dead fag." INGRAM also suggested orchestrating an accident involving GREENE on the Golden Gate Bridge that would result in GREENE's car going over the side of the Bridge.

g. INGRAM and SCIENTOLOGY have also attempted to have GREENE disbarred by filing complaints with the State Bar.

8. At the instigation of EUGENE INGRAM, DAVID BUTTERWORTH and the aforementioned attorneys in BOWLES AND MOXON I have executed declarations in which I made false statements of fact. With respect to FORD GREENE, the false statements of fact that I made included, but were not limited to, the following:

a. FORD GREENE is a homosexual. The truth is I have no basis for this statement;

b. FORD GREENE frequented the Castro Street area (a gay area) in San Francisco. I have no factual basis for this statement;

c. While nude FORD GREENE hugged me and would not let go. This is false.

d. GREENE took a picture of me, naked, as I was leaving the shower. This is false.

9. INGRAM, BUTTERWORTH and lawyers at BOWLES AND MOXON repeatedly expressed that they would do anything to prevent GERALD ARMSTRONG and FORD GREENE from working together.

Pursuant to the laws of the State of California, I hereby declare the foregoing to be true and correct. Executed on February 11, 1993 at Portland, Oregon.

Garry L. Scarff

GARRY L. SCARFF

"FACTNET" — PERVERSIONS, CRIMINALITY and LIES

7512

The purpose of this flier is to clear the air on some incredible and outrageous lies that have been circulated around about myself, friends of mine, and other innocent people whose only fault was that they have stuck their necks out and taken a stand, as Scientologists, to improve the world we are living in.

I am referring to a flier recently distributed by a group calling themselves "FACTNET", which is replete with such outright false data that it defies belief that anyone could come up with such garbage. After reading this flier I decided I had to find out who could do such a thing and why. When I did, and found out about the people who were involved in this, it became more understandable. After all, what can you expect from people who are so low that they can't do anything more worthwhile than to try and destroy other people by twisting truth, lying and then trying to make a living out of it.

FACTNET emerged in January 1994 claiming to be a "research and educational public service" group, using an address of a P.O. Box in Golden, Colorado. FACTNET's first mailing, rife with rumours and lies, has stirred up scores of individuals across the United States who have filed complaints demanding that state and federal authorities investigate who and what FACTNET really is.

An odd mixture signed on to FACTNET's board of directors: a retired psychologist who is embroiled in bitter litigation with her peers in the psychological community; a 25-year con artist who moves from state to state promoting an ever-changing array of gadgets, fad diets and new-age personality boosters; a clerk and self-proclaimed founder of "renunciants" who says that money should be abolished; a former Dominican priest who abruptly left the priesthood shortly after becoming affiliated with FACTNET; a former dope dealer, ex-convict, mental patient who earns a living as a deprogrammer; a recluse living in Longmont, Colorado who apparently spends his days scanning paper into FACTNET's computer; and a sexual pervert whose literary career spans from community news in a now defunct small weekly newspaper to writing and editing on pornographic bulletin boards.

Looking over the FACTNET materials that I have been able to collect, it becomes clear that they are nothing more than a holding company for lies and untruths for sale - to money grubbing attorneys, spineless "deprogrammers", senseless reporters and the like.

Why?

A closer look into the background of FACTNET's founders explains their true motivation.

All of the individuals involved in FACTNET are also involved with or members of the Cult Awareness Network (CAN), an anti-religious hate group that has come under close scrutiny by federal authorities in recent years for operating as a deprogramming referral network.

CAN, earlier known as "Citizens Freedom Foundation," is most well known as the brainchild of Ted Patrick, a convicted felon who has deprogrammed members of the Catholic Church, Amish religion and lesbians (one was raped by Patrick's cohorts as a means of converting her sexual preferences). Deprogrammers advocate coercive tactics to "dissuade" anyone from anything thought objectionable by the customer holding the purse strings.

"Deprogrammers" charge outrageous sums of money – several thousand dollars for a "days work" – which they get out of upset and unsuspecting relatives who have been twisted by the lies fed by groups such as CAN. FACTNET is apparently in the same business, but in their case are selling their lies to the deprogrammers, and hired gun attorneys to use to try and poison the courts.

***CAN's former security chief, Galen Kelly, is currently serving a 7-year sentence on kidnapping charges related to a deprogramming attempt.** Galen Kelly had been put on a $1500 monthly retainer in 1992 by CAN's Executive Director, Cynthia Kisser, but this funding ceased after his arrest by the FBI in September 1992.*

Deprogramming, although a lucrative business, has its pitfalls. Ted Patrick summed it up well in his 1976 book: "... it may be said to involve kidnapping at the very least, quite often assault and battery, almost invariably conspiracy to commit a crime, and illegal restraint."

Who is behind FACTNET?

LARRY WOLLERSHEIM, FACTNET's Treasurer, is an opportunist from Milwaukee, Wisconsin who successfully dodged the draft in 1969 by convincing a psychiatrist he was unfit for military service. *After abusing nearly every illicit drug available in the streets, including 300 hits of LSD, it is not surprising that he became a drifter who has been under the care of a psychologist for nearly 15 years.*

WOLLERSHEIM is an admitted wife-beater who ran a meat business in Los Angeles in the early 1970s (and was sued by the City for false advertising). He dumped the business on his partners, leaving them with $20,000 in debts, and the company later went bankrupt.

In the late 1970s, **Larry Wollersheim** started up a picture-selling business which he called Beautiful Pictures Beautiful Gifts, which operated out of Denver. Late in 1977, Wollersheim left Denver with 4 months rent owing on the lease of his office space. He then started a branch office of Beautiful Pictures Beautiful Gifts in Houston and left in March 1978, breaking a $2000 lease. He lived briefly in Dallas in 1978 and left two banks overdrawn and broke a two year lease on an apartment.

In July of 1978 **Wollersheim** opened up Beautiful Pictures Beautiful Gifts in Los Angeles. *His unethical business practices caused the loss of thousands of dollars to his clients.*

His businesses owed money to many creditors, some of whom took legal action against Wollersheim to collect — the glass company which provided the glass for the pictures that sued for $4,000 for credit extended; the supplier of the art prints who claimed that Wollersheim defrauded him out of $6,000; and the factoring company which was owed $45,000 from uncollectable accounts receivable.

Wollersheim moved to Aspen, Colorado sometime around 1980, where he solicited over $200,000 from investors for speculative fitness products. *Two people who contracted with him to produce and market his products, never saw a penny of the $70,000 they invested in Wollersheim.*

Using the pseudonym of Robert Lawrence, **Wollersheim** plagiarized material from a local doctor in Aspen which he published in a book he called, "The Aspen Diet." Local press claimed that "Robert Lawrence, through a couple of years research on mind control, behavior and brain laboratory studies, has developed a system for mind control." (It is not surprising that Wollersheim tried out a "mind control" system as a new angle for making a quick buck, considering that his mentor and personal psychologist, Margaret Singer, has harped on her "mind control" theories ad nauseum, despite being rejected by the courts and the APA.) Several people invested a total of at least $85,000 in the Aspen Diet - and lost it.

Wollersheim *later claimed in a Personal Financial Statement filed with the court in February 1990 that bills due from the later collapse of his Aspen business totalled approximately $275,000.*

In 1983, while in Aspen, **Wollersheim** harassed his roommmate to the point where the police were called to investigate Wollersheim's connection to the roommate's broken windshield. Wollersheim was warned that if he kept on with this behavior, he would be summonsed to court.

By September 1984 the Aspen Diet investment deal fell through. Wollersheim fled the area in February 1985, turning over the business and its liabilities to others and leaving the area.

In September of 1992, **Wollersheim** advertised workshops in Milwaukee entitled "EMPOWERMENT NOW." His promotion claimed that he had authored two books and "numerous" motivational training manuals, and that he had "13 years experience conducting inspiring, life-enhancing peak experience workshops."

Like the claims now being made by FACTNET, these representations were clearly hype. **Wollersheim** has used 3 different social security numbers, apparently to hide his identity.

Wollersheim is now claiming that FACTNET offers educational and research information ... which can be accessed only by "pre-screened" individuals?

Wollersheim's sanity might be measured against a letter he mailed out to Scientology attorneys in 1992 in which he claimed that he had discovered that Scientololgy is "some type of intelligence agency project", a "renegade think tank field experiment" of the NSA or some other government intelligence agency. After communicating his great realization, he concluded, "you know I know, and I know you know, and everybody and both levels of government knows we all know." With this sort of brilliant analysis, no wonder he is now filling a computer in Colorado full of lies to try and make a quick buck from profiteering attorneys and unsuspecting dupes.

STEVE FISHMAN, *ex-convict sentenced in 1988 to 5 and a half years in prison for 11 counts of mail fraud and one count of obstruction of justice (he is currently out on parole), is the source of many of FACTNET's claims of "murder" and "psychosis."*

In the words of his psychiatrist, **Fishman** *is a man who will lie and manipulate others until the day he dies.* The Federal prosecutor who investigated Fishman, saw through Fishman's wild claims that individuals have been murdered by Scientology — correctly labelling these allegations as "total poppycock." In fact, it was Fishman's attempt to blame the Church of Scientology for his own crimes which resulted in the obstruction of justice charge against him.

Fishman is an admitted compulsive liar, whose entire life is woven with illusions and lies concocted for those he deals with. In federal court in July 1990, while on trial for crimes he was later convicted of, Fishman claimed that he was "Malchoot", the "father of Jesus" in an earlier life. Fishman went on to describe this entity:

> "Malcoot is Antichrist. He gets certain suggestions with occlusion, of course, that he was the father of Christ and he had — he had taken a bath, which in today's parlance would be analogous to a Jacuzzi. And allegedly he had masterbated in the water and then the sperm had entered Mary and then Jesus was born, and so he was Malchoot the Antichrist and father of Jesus of the illegitimate father of Jesus."

His hypnotist/psychologist, testifying in this same trial, described Fishman as "manipulative" and said that he has been insane and schizophrenic since 1968.

How can Fishman qualify as a source of information about anyone or anything?

If you need more, take a look at the affidavit of FBI Special Agent William Kemp, executed on January 26th, 1989, describing his investigation of **Fishman**. Kemp had earlier arrested Fishman in July of that year for "devising a scheme and artifice to defraud over 20 Federal Class Actions Lawsuits." "The amount of the fraud is in excess of $800,000." Kemp describes in the affidavit how Fishman then paid $40 to a prostitute to make threatening phone calls to him to make it sound like they were Scientologists, in an attempt to blame his criminal path on Scientology (see copy of Kemp's affidavit attached).

Need I say more?

ROBERT VAUGHN YOUNG is a key source for some of the more outrageous material that has been disseminated by FACTNET.

To put this into perspective, **Robert Young** *is a sexual pervert and a criminal.* He was convicted of theft and sentenced for it. He attempted to seduce a 16 year old girl, luring her into his hotel room, climbing into her bed, and making sexual advances.

Robert Young has been involved in other perverted behavior. He has edited hard core pornographic material from a woman he met on a bulletin board service. In one letter to Young, introducing him to her latest sex stories which she was asking him to edit, she described one as about, "a man I was to meet and possibly have an affair with" and another as, "a sex story about a pre-teen." She credits Young for having gotten her re-started in her porn story career, and wrote "the last two chapters (of the pre-teen sex story) since I have been talking to you." She concludes her letter to Young asking him to:

> "give me your HONEST opinion over the phone. THEN we can meet. As you have probably guessed, I'm quite a flirt, and go out to meet these different men I write to on the boards... And I am HONESTLY NOT trying to brag, but when I meet these men, I have never been turned down. I have only had two lovers out of about thirty or so, and that's why I think YOUR idea of reading them THEN meeting is a GREAT idea! The last writer I had read one of the stories, ended up kissing me IN THE PARKING LOT!"

Take this example of the high class literature that she was asking Young to edit:

> "Mike's penis exploded in a dazzling ball of flame, blood, and small bits of toasty semen. Mike was thusly incapacitated and will no longer appear in this story.
>
> "Pam found herself alone, covered in cooked semen and shredded foreskin. 'Not again!' she yelled. 'That's the third fucking time this week!'
>
> "But suddenly.... Pam began to inflate much like an Oscar Meyer weiner. Shortly thereafter, her breasts (looking somewhat like deformed cans of spam dripping gelatin of sorts) lost density and caused her to float into the atmosphere, where she was never heard from again. Therefore, she will no longer appear in this story.
>
> "We turn now to Ken. He is a corpse who is greatly enjoying the peace brought on by his recent death. He doesn't have a care in the world. Except for one thing...
>
> "Jerry always liked Ken. More accurately, he LOVED Ken. More accurately so, he LOVED Ken's hiney. Jerry was also enjoying the recent peace... or shall we say PIECE... given to him upon Ken's death. You see, Jerry is a necrophiliac, and this is...
>
> "— DEAD ENDS —
> "(or, Dead Men Have No Tails)
>
> "Jerry was leaving the funeral parlor with his recently obtained prize... Ken's rigor mortised rump..." "Jerry was so excited to try out Ken's hallowed Hershey highway, he had to sit down on a nearby bench and stroke himself to a somewhat turgid status...."

(I will spare you the details, it goes on from there.)

Young *is a self-admitted "peeping Tom". He has regularly visited pornographic movie theaters, nude beaches, and "massage parlors" for perverted purposes.*

On 10 Sept 1987, **Robert Young's** son Dave, age 18, was committed to a mental ward at the UC Irvine Hospital after the police traced a call he'd made to the suicide hot line.

Honesty is not a trait for **Robert Young**. He was engaged in shoplifting at an early age, stole money from his employers for personal use, and stole material from the Marine Corps (including an expensive radio) which he never returned.

Is Young's data to be believed? With a sordid history as above, one must wonder his motive for working with FACTNET.

GERRY ARMSTRONG, according to their Articles of Incorporation, is the President of FACTNET.

In December 1981 **Armstrong**, who worked as a librarian for the Church of Scientology, stole more than 10,000 pages of records belonging to L. Ron Hubbard and the Church. Armstrong loaned and showed the documents to others who were bent on attacking the Church to support their attacks.

Armstrong's state of mind is clearly illustrated by various "literary" writings authored by him, none of which more clearly demonstrated it than a document now known as the "pig letter", in which **Armstrong** *described in graphic detail a dream he had where a pig asked him to have sex and he declined despite the fact that he wanted to. Armstrong was formerly a heavy drug user, and on at least one occasion, he was paid to provide homosexual sex.*

On November 11, 1992, in the Marin Independant Journal there was an article on Gerald Armstrong titled “Is Money The Root of Problems.” In the article, there is a picture of **Armstrong** *in the nude holding a globe*. This article states that Armstrong has an idea for dealing with the national debt - “write it off. Forget it. It doesn't exist.” The article goes on to state that Armstrong, the self-proclaimed founder of the Organization of United Renunciants, set the date for people who have taken his “pledge of renunciants” to stop using money. Fellow renunciants will renounce all cash and credit, stop taking money, stop paying with money, forgive all their debts and stop keeping financial records.

JON ATACK is another sorrowful character, who is rumored to be taking over the presidency of FACTNET from Gerry Armstrong.

Atack *is an ex-psychiatric patient, a convict and a drug dealer.*

He was under psychiatric counseling from the age of 13 until 18. He then spent time in a psychiatric hospital, and was given anti-depressant drugs which “knocked him out for 20 hours.” **Atack** *is a troubled individual who continued to take heavy street drugs, including LSD, marijuana and cocaine.* **Atack** was dealing in drugs, and was convicted twice (which was covered in the English press), once for illegal possession of drugs, and a second time for growing marijuana plants.

Atack *has had a long association with criminal deprogrammers in a “kidnapping for hire” ring called FAIR, which is involved in forcibly attempting to break one's religious faith through the use of violence and kidnapping.*

One of **Atack's** cohorts in this group was **Neil Dawson**, the Dulwich vicar and chairman of FAIR from 1986 to 1988. Dawson stepped down after a barrage of media stories revealed he had regularly conducted and participated in homosexual orgies involving illegal drug use at his vicarage.

Another of **Atack's** collaborators is **Cyril Vosper**. In 1987, a Munich court convicted him of false imprisonment and causing bodily harm to a 32-year old German woman he had kidnapped. The woman escaped by smashing through a window, but not before badly cutting herself.

Martin Faiers, another **Atack** associate, was convicted of kidnapping a Swiss member of the Hare Krishna movement in 1989. During this violent faithbreaking, the victim was forcibly drugged, tear gassed and handcuffed.

Another victim, a 25-year-old woman in Devon, England, was found hanged to death following a Faiers' deprogramming.

These are only a few of Atack's and FAIR's corpses and deaths that they are responsible for.

On recent visits to the United States, **Atack** has been noted associating with known criminals — Paul Barbaro who is presently incarcerated on Grand Theft charges, and William Jordan who served time for driving under the influence and currently has an outstanding arrest warrant for carrying a concealed weapon.

MARGARET SINGER, who first started treating Larry Wollersheim in the early 1980s, is a founding board member of FACTNET, and various other anti-religious groups in the United States had earlier relied heavily on the theories of Margaret Singer in attacks upon religions. *Singer, however, has been completely discredited in the courtroom, as any sort of “expert” in this field, and courts have debunked the “scientific” basis of her rantings against new religions.* The mounting criticism of her wholly unscientific methods and opinions have finally caught up with her.

Her fall from hired gun “expert” status to sham began when **Singer** and a task force set up within the American Psychological Association (APA) to study methods of “persuasion and control” filed their final report to the Board of Social and Ethics Responsibility for Psychology of the APA.

This report was resoundingly rejected by the Board in 1987, which stated, “In general, the report lacks the scientific rigor and even-handed critical approach needed for APA imprimatur.” The APA Board even went further and put the task force members on notice that their appointment to the task force was not be used to imply that the APA in any way supported the positions in their reports (i.e. anti-religious theories).

Not to be daunted by this rejection, **Singer** began a series of “expert” testimonies in various legal cases dealing with new religions. In the Kropinsky v. World Plan Executive Council case, the District of Columbia Court of Appeals in 1988, citing the lack of acceptance of Singer's theories: “Kropinski failed to provide any evidence that Dr. Singer's particular theory, namely that techniques of thought reform may be effective in the absence of physical threats or coercion, has a significant following in the scientific community, let alone general acceptance.”

In 1989, Fourth Appellate District Court of Appeal of California dismissed **Singer's** testimony. The Court stated that the “brainwashing theory of false imprisonment is no more than an attempt to premise tort liability on religious practices that Georges (party in the case) find objectionable. Such a result is simply inconsistent with the First Amendment.”

In 1990, U.S. District Court Judge D. Lowell Jensen in US v. Fishman barred **Singer** from testifying because her ideas were not accepted within the scientific community. Jensen said, “The evidence before the court .... shows that *neither the APA [American Psychological Association] nor the ASA [American Sociological Association] has endorsed the views of Dr. Singer* ... on thought reform. *The APA found that Dr. Singer's report* *lacked scientific merit and that studies supporting its findings lack methodological rigor."*

In 1991, the US District Court in DC in the case Patrick Ryan v. Maharishi Yogi, found that Singer's expert testimony had failed to gain substantial acceptance. Judge Oliver Gasch *refused to allow Singer to testify.*

Despite her 14-year history of being thoroughly discredited as an "expert," **Singer** continues to be listed as a consultant for CAN.

KENT BURTNER is another founding board member of FACTNET.

Burtner has served as the Treasurer of the Cult Awareness Network (CAN) since February 1993. He has served on the Advisory Board of CAN for several years, and has been involved with CAN (and its predecessor Citizens Freedom Foundation) for over 20 years.

Up until February 1994, he was a Dominican priest at St. Dominic's Church, in San Francisco. *He recently left the priesthood for reasons unknown, and moved to Portland seeking employment.*

Burtner has admitted to being pro-deprogramming and having been involved in numerous deprogrammings since the 1970s. News articles in Anchorage, Alaska, where Burtner lived from 1983 until 1987, indicate that Burtner first got interested in cults in 1970, when a daughter of a secretary of his seminary became involved with the Unification Church. In this article, Burtner stated that he deprogrammed 20 members of religious groups and had "rehabilitated" about 100 more from 1973 to 1983.

An October 1981 article in an Oregon paper, Siskiyou, quoted **Kent Burtner** as saying "Bruntner (sic) agrees that some self-styled 'deprogrammers' have tried violence, screaming, sleep deprivation, and sensory overload to shock a cult member out of his present mental state."

Another October 1981 article, in the St. Petersburg Times, stated that a psychiatrist from California, a theologian from Canada, the Florida vice president of the American Civil Liberties Union and a spokesman for the Florida Catholic Parents Association all denounced the activities of the Citizens Freedom Foundation (CFF), characterizing it as a threat to religious liberty in America. These individuals said that their appearances were prompted only by mutual concern for the civil rights of victims of "deprogramming," which they said is a principal focus of CFF, and other "anti-religious" activities by CFF. Burtner had been closely associated with CFF and also per this article, was listed as one of the speakers at the next CFF convention.

In 1977, an article came out in the Oregonian, mentioning that **Burtner** had assisted in several deprogrammings. One of these involved a deprogramming at the Newman Center on the University of Oregon Campus. **Burtner** was also mentioned in another 1977 article in Northwest Magazine entitled, "The Deprogrammers." In this article he referred to kidnapping as a "very gentle thing because you can't use fear to deprogram a person."

BOB PENNY, a member of the Cult Awareness Network who is living on 100% disability insurance, did the computer design work for FACTNET. According to a former employee who chooses to remain anonymous, *Penny has defrauded the insurance company which sends him a monthly check, and he even attempted to defraud Social Security.* After a desperate attempt to find volunteers who could help feed paper into FACTNET's computer, which is kept in Penny's home, **Penny** *found a local homosexual priest who is now working with Penny out of his home.*

A closer look is needed into FACTNET and those behind it. What other perversion, criminality and psychosis lies behind the accusations made by FACTNET? FACTNET's black propaganda and thought reform program has led to numerous innocent individuals being libelled by their issuance of false and misleading information. What is FACTNET's real agenda? Please – help bring these matters to light and protect possible future victims.

Your Help is Needed

YOUR HELP IS NEEDED TO BRING TO LIGHT THE TRUTH ABOUT FACTNET. IF YOU HAVE BEEN MALIGNED BY FACTNET, IF YOUR FAMILIES HAVE BEEN THREATENED, OR IF YOU KNOW OF SOMEONE WHO HAS BEEN HARMED, PLEASE REPORT THIS TO YOUR LOCAL POLICE DEPARTMENT, YOUR STATE REPRESENTATIVE, YOUR LOCAL DISTRICT ATTORNEY AND THE UNITED STATES ATTORNEY FOR YOUR AREA.

RBC:GP26

Affidavit

I, WILLIAM E. KEMP, JR., do depose and say:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed for the past twelve and one-half years. I have conducted an investigation which has disclosed the following facts.

2. On July 21, 1988, STEVEN FISHMAN was arrested by your affiant at the Miami International Airport as he deplaned from Iberia Airlines Flight 965 from Madrid. FISHMAN was arrested based on a criminal complaint warrant issued on July 7, 1988, in the Northern District of California, San Francisco, California for devising a scheme and artifice to defraud over 20 Federal Class Actions Lawsuits being heard in Federal Courts in the Northern District of California as well as other Federal Districts throughout the United States, in violation of Title 18, U.S.C. Sections 1343, 1341, 371 and 1001. The amount of the fraud is in excess of $300,000.

3. On August 1, 1988, FISHMAN appeared before U.S. Magistrate Linnea Johnson, Southern District of Florida, and was released on $100,000 personal surety bond to be cosigned by his father and also a $100,000 ten percent bond. FISHMAN has since been indicted in the Northern District of California for the matters described in paragraph two. FISHMAN's attorney in the above matter is Marc Nurik of the law firm of NURIK and KYLE, 2937 S.W. 27th Avenue, Miami, Florida.

4. Subsequent to FISHMAN's arrest he began receiving packages at his apartment, 3800 Galt Ocean Drive, Fort

Lauderdale, Florida, which contained aerosol cans of freon, lubricants and other solvents and documents purported to be from the Church of Scientology of which FISHMAN is an admitted member. According to NURIK and FISHMAN this material was to be used by FISHMAN to "commit suicide" and that the Church of Scientology was responsible for sending the packages.

5. On November 9, 1988, your affiant placed a telephone recording device at the request of MARC NURIK and Steven Fishman on FISHMAN's at his apartment, located at 3800 Galt Ocean Drive, #1102, Fort Lauderdale, Florida, for the purpose of consensually monitoring telephone conversations between STEVEN FISHMAN and unknown and known members of the Church of Scientology.

6. On December 13, 1988, STEVEN FISHMAN said he received a telephone call at approximately 12:00 midnight from a male individual who identified himself as "SCOTT", last name unknown purportedly an operative of the Church of Scientology. FISHMAN provided the original cassette tape and a transcript of the above conversation to your affiant. FISHMAN also furnished an interpretation of the conversation which is, in part, in coded terminology known by members of the Church of Scientology. According to the interpretation by FISHMAN, this conversation was a death threat to MARC NURIK and Dr. UWE GEERTZ, FISHMAN's psychiatrist. For example, at one point during the recorded conversation "Scott" tells FISHMAN that Mr. Nurik's wife "Cindy will be saying 'codish' (sic, Kaddish) for Marc next Thursday at 2".

7. On January 9, 1989, your affiant served a Federal Grand Jury subpoena on DUSTY HIPPS, 1156 Lincoln Street, Hollywood, Florida relating to the indictment of FISHMAN in San Francisco, California. At this time SHANE JOHNSON introduced himself as HIPPS' boyfriend and advised that he had done a favor for FISHMAN by making a telephone call for him and was paid $40.00.

8. On January 10, 1989, SHANE JOSEPH JOHNSON advised that STEVEN FISHMAN picked him and his girlfriend, DUSTY HIPPS, up at 5611 Lincoln Street, Hollywood, Florida, at approximately 10:30 p.m. the evening of December 12, 1988, and drove them to Coral Gables, Florida for the purpose of making a telephone call to STEVEN FISHMAN's residence at midnight. JOHNSON advised that during the drive to Coral Gables, Florida, FISHMAN had him rehearse the conversation which he, JOHNSON, was to say. FISHMAN provided JOHNSON with a script of the conversation. Upon arrival at the Denny's Restaurant, Coral Gables, Florida, FISHMAN gave JOHNSON $20.00 in U.S. currency and $1.00 in quarters with instructions to call him from the coin telephone at his apartment, #1102, at midnight and repeat the conversation which FISHMAN provided him. After the conversation took place he and DUSTY HIPPS waited for FISHMAN to pick them up and return to Hollywood, Florida, at which time FISHMAN gave him another $20.00 in U.S. currency and asked for the telephone script back.

9. On January 17, 1989, SHANE JOHNSON listened to a recorded telephone conversation between "SCOTT", last name unknown, and STEVEN FISHMAN, which took place on December 13, 1988. Subsequent to listening to the conversation, JOHNSON stated

that that was his voice and the conversation was the one which STEVEN FISHMAN had him to rehearse and paid him $40.00 to make the call. In the opinion of the undersigned JOHNSON's voice and "SCOTT'S" voice are identical.

10. On January 13, 1989, your affiant learned that after he served the subpoena on DUSTY HIPPS on January 9, 1989, she contacted FISHMAN. Thereafter, on January 10, 1989, FISHMAN came to the residence of Hipps and Johnson and gave Johnson $50.00 telling him Johnson should not tell the FBI that he had been paid by Fishman to make the phone call of December 13, 1988, but, instead, to manufacture a cover story that he was working for the "Ronnie" LNU.

FURTHER AFFIANT SAYETH NAUGHT.

WILLIAM E. KEMP, SPECIAL AGENT
FEDERAL BUREAU OF INVESTIGATION

Sworn to and Subscribed
Before me on this 20 day
of January, 1989.

LURANA S. SNOW
UNITED STATES MAGISTRATE

CA 900 37
P M

GERRY ARMSTRONG
715 Sir Francis Drake Blvd
San Anselmo, CA 94960

"FACTNET"

STILL OFF THE RAILS

This is the third in a series of fliers which I have sent out in order to provide insight into the motivation of the creator of FACTNET and its main supporters, officers and directors. Behind the warped lies being spread in FACTNET are Larry Wollerslime and his cohort Bob Penny. Despite all Wollerslime's promises, FACTNET has never caught on and if Wolly is true to his past pattern of criminal business practices, as soon as he realizes he cannot make a fast buck, he will withdraw from FACTNET and run away to his next scam. Don't forget that Wolly is a guy who has abused nearly every street drug available including some 300 hits of LSD and thus it is understandable why FACTNET is such an abortion of the truth.

On top of that, Wolly has been under psychological care for over 15 years and he has been receiving "legal drugs" as treatment. It is no wonder that FACTNET can't get its act together much less print the truth — if Wolly could even recognize it after all the LSD.

FACTNET: Update

Jon Atack, a social outcast who is President of FACTNET has been having problems in court. Atack, who is also a drug abuser, had filed suit against the Church in March 1993, claiming breach of confidentiality and asking for unspecified damages. Atack was upset because the Church in the UK had published the truth about him having had two drug possession convictions, psychiatric treatment and that he had used LSD. Atack did not dispute the facts but he stated to the court that he was worried that if the truth were known about his background, he would no longer get deprogramming clients.

Atack refused to produce adequate financial documents in the case to show the damage he claimed (he obviously had too much to hide) and $58,000 in costs was awarded to the Church and the court threw out Atack's case. Atack is now facing involuntary bankruptcy.

Even Atack's wife Noella could no longer stand having him around the house (he has not held a regular job in years and refuses to) so sent him packing to Nottingham where he had to move back in with his mother because he could not support himself.

Atack, his cohort Larry Wollersheim, the Vice President and master mind behind FACTNET and its former president, Gerry Armstrong, were all curiously absent from the annual CAN convention this year. Rumor has it that during the previous year's CAN convention, Larry Wollersheim was confronted by someone who had been ripped off for thousands of dollars by Wollersheim in one of his scams from earlier years. Wolly was visibly shaken after the confrontation. (You would be too if you had as much to hide as he does.) In order to prevent a repeat performance this year, Wolly chickened out and just did not show up. Or, could it be that after Marty Butz, who runs CAN's hotline, finally admitted he had made over 500 deprogramming referals for CAN including to deprogrammers, who had been arrested for kidnapping, and that Wollersheim, Armstrong and Atack are afraid of being arrested for being part of a criminal organization?

Also absent from the convention was CAN's former Chief of Security, Galen Kelly, who has just learned that he will be retried on January 17th 1995 for kidnapping a Virginia woman. Kelly who has just spent 17 months in jail, cannot pay his old law firm and so is pleading indigency in order to get a court appointed attorney to represent him. Kelly is broke, abandoned and now attorneyless. There is speculation that Graham Berry will defend Kelly.*

Graham Berry, The Man Behind FACTNET'S Bag of Toys

Graham Berry, is an attorney employed with the Los Angeles law firm of Lewis, D'Amato, Brisbois, Bisgaard, a firm which makes a large percentage of its earnings from the insurance companies it defends. Ever wonder why your insurance premiums are so high? This firm recently had one of its lawyers fined $1.5 million for filing and knowingly pursuing an unfounded malicious lawsuit. This was one of the largest such fines in California history. That law firm is also the defendant in several other malicious prosecution cases for similar actions.

Following in this tradition of soaking insurance companies for every penny possible, Graham Berry concocted a scheme to pay Larry Wollersheim, Gerry Armstrong and Stacy and Vaughn Young (all prominent members of FACTNET) to be witnesses in a libel case involving a psychologist by the name of Uve Geertz — most of it AFTER the case was over.

Berry manipulated the insurance company into paying these "witnesses" in order to provide himself with the false testimony he desperately needed. Why would he need false testimony to defend his client? You see, Geertz is a two bit hypnotherapist who claims to be an expert in deviant sex (he had been quoted by the media on Erotic Death Syndrome and is an "expert" on the results of ink blot tests on homosexuals). Geertz treated FACTNET associate, Steve Fishman, who admitted that he had schemed with Geertz to make video tapes of faked hypnosis sessions where Fishman was the subject so that Geertz could obtain a government grant and to collect insurance money for the "treatment".

In his defense of Geertz, Berry was able to convince the insurance company, American International Group (AIG) that paying bogus witnesses was a worthwhile investment, even though Geertz' had only paid a $900 premium for policy coverage of $1 million. The Lewis, D'Amato firm had to be proud of Berry since he was able to rake in over $1.5 million from the insurance company to defend the case. (That's a return of $1,500 for every $1 paid into the insurance company.)

That the declarations filed in the Geertz case were replete with distortions and outright lies was exposed in a declaration filed in the case which details a meeting held with Stacy and Vaughn Young where they admitted that they were in an occupation which required them to figure out how to manipulate and distort facts for use in litigation.

The Young's business of selling declarations to Berry began only because they had gone into serious debt and needed the money. The Youngs stated that they could only get paid if they provided what was needed by Graham Berry — thus they had engaged in "creative writing" to distort the facts, make false inuendo, and paint a picture which was the opposite of the truth. A small amount of truth did emerge however when Stacy Young stated that fellow FACTNET member Gerry Armstrong is psychotic and lives in a delusory world and that Wollersheim is as crazy as Armstrong is.

You may be wondering just who is Graham Berry, the man behind the scenes who could pull off getting an insurance company to pay tens of thousands of dollars for false testimony. So did I and therefore I started reviewing materials which are part of the public record and what I found was a shocking tale of perjury, extortion, lies and scandal.

First off, I learned that Graham Berry paid over $72,000 to ex-Scientologists to create false declarations and act as "expert" witnesses. Amongst these was Andre Tabayoyon who Graham Berry had paid over $17,000 to sign a declaration for him. However, Tabayoyon never saw the final version of it and according to a declaration filed in court by Richard Anzaran (who had also been paid by Berry), Berry had Tabayoyon sign a signature page for a declaration and then inserted pages of his own creation, producing a false declaration which was 60 pages long. Berry took advantage of Tabayoyon, who he judged to not be too intelligent, so that this false declaration could then be leaked to the media resulting in several negative tabloid articles, the purpose of which was made clear in various extortion threats made by Berry as detailed in the court documents.

Berry's extortionate demands

for money from the Church in exchange for silence on the part of the "expert" witnesses he was paying to make false declarations, included statements that unless a large amount of money was forthcoming he would distribute to the media these false statements made by his paid witnesses and that he would cause unnamed criminal investigations, which he claimed to have created, go away by no longer cooperating with the authorities.

Vicki Aznaran, another of Berry's paid witnesses swore out a declaration filed in court that Berry had paid her $2,500 to do an eight page declaration for him as an "expert" witness. However, Vicki later discovered that Berry had inserted another ten pages of false allegations into the declaration unbeknownst to Vicki and falsely attributed to her.

This type of unethical behavior is not unknown to Berry who formerly lived in New York where he was a partner in a law firm by the name of Spiegelman and Berry. Jerome Spiegelman is a famous name in law enforcement circles in New York having bilked clients out of millions of dollars belonging to them. Spiegelman ended up having his license revoked and was jailed for his criminal behavior. Just prior to this, his partner Graham Berry filed bankruptcy and, shortly before Spiegelman was indicted, Berry disolved the law firm and left the country later surfacing in Los Angeles in his current law firm.

Berry's partnership previous to Spiegelman was with an attorney named Frank Hoffey. This partnership ended in a bitter lawsuit brought by Berry. (Hoffey later died of AIDS.)

In reviewing this case, I discovered that Berry had filed a bar complaint against Hoffey on behalf of Vincent Catanzaro, who when he learned about it, had to write a letter stating that Berry does not, nor did he ever have authorization to lodge such a complaint against Hoffey. As detailed above, Berry seems to have no problem with fabricating statements from clients when it suits his own ends.

The Berry declaration is most amazing in the way that he whines about being referred to as "gay." Yet he then admits he attended an annual dinner put on by the Bay Area gay and lesbian legal community? It makes one wonder why Berry protests so loudly? Is he ashamed of being gay? Does he have something to hide? I could not understand what the big deal was as certainly there are gay attorneys in Los Angeles but it seems Berry has a problem with it.

For some reason Berry is upset by mention of his affiliation with the gay community. For instance court documents show that Berry denies that he has AIDS. Why would an attorney representing someone in a libel suit file his own declaration to deny he has AIDS? However, because of his repeated protests, I checked further and learned that Berry was in fact a co-founder of the AIDS Medical Foundation (forerunner of the American Foundation for AIDS Research). As noted, Berry's former law partner, Frank Hoffey, who had the same New York address as Berry, died of AIDS. And, according to documents found in New York in court files and other public records, one of Graham Berry's close friends, Seth Cooper, who tried to mediate the lawsuit between Berry and Hoffey, died of AIDS. It is of interest to note that one of Berry and Hoffey's clients was *After Dark Magazine*, a publication for homosexuals which went bankrupt and whose publisher died of AIDS. The New York attorney who represented Berry in his own bankruptcy in 1985 also died of AIDS in 1991.

So the real question is, why does Graham Berry want to hide it?

All of this is in the public record and can be verified as true.

— Barry Waterman

If you know of someone who has been maligned, harmed or defamed by FACTNET, report this to your local police department, your state representative, your local district attorney and the United States attorney for your area.

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23 AM 8 12

LOV
USA

Address

Church of Scientology International
Office of Special Affairs

7523

May 9, 1994

Mr. Charles Collier-Wright
Mirror Group Newspapers
One Canada Square
Canary Wharf
London E14 5AP
United Kingdom

Dear Mr. Collier-Wright:

I was sorry you were not able to meet with me or take me up on my offer to visit the Church facility that was the subject of the Mirror's story, even though you had travelled all the way to Los Angeles.

You may believe that Mr. Berry will be able to assist you by providing information of value. You are unfortunately mistaken, however.

Whatever Mr. Berry or his hired declarants may assert, a) five of Berry's "witnesses" in the now defunct Fishman case who supposedly corroborate Andre Tabayoyon's testimony have never been to Golden Era Productions: b) his other witnesses all left the facility before Tom Cruise visited and none has returned since. None, therefore, has any personal knowledge concerning Mr. Cruise having been there and the outrageous allegations of Andre Tabayoyon are indefensible.

Any information obtained from Mr. Berry (who has never visited the facility himself) or those on his witness list would be hearsay. Presumably Mr. Berry's list of "witnesses" includes the following:

Robert Vaughn Young:

Mr. Young has not been at Golden Era since June 1989, prior to Mr. Cruise having visited.

According to his own testimony, Young made no effort to attack the Church of Scientology until he lost his job and found himself "very hard up for money." He then approached an attorney

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for the Church and demanded $50,000 in exchange for his "story" about Scientology. The Church refused his demand, so Young placed himself on the market as a paid-for declarant, manufacturing false testimony on behalf of Berry's clients, Fishman and his hypnotherapist Uwe Geertz (neither of whom he had ever met.)

Mr. Young also has a criminal record and served time in jail for theft, which further compromises his credibility.

Stacy Young:

Stacy Young has not been at Golden Era since August 1988. Like her husband, she made no effort to attack the Church until she saw this as a solution to the money problems that she and her husband were experiencing owing to their inability to maintain regular employment. Mrs. Young testified that she quit her job selling real estate advertisements in order to pursue a career writing declarations for money because the latter was "more lucrative."

Gerald Armstrong:

Armstrong has not been to the property occupied by Golden Era Productions since November 1981, well prior to Golden Era Productions' establishment. He has not set foot in any Church of Scientology since December 1981.

By involving himself with Church of Scientology litigation, Mr. Armstrong is in violation of a legal agreement he made in 1986. Were the Mirror to call him as a witness, your client would become party to that violation. However, your client would be advised not to rely on information from Mr. Armstrong. He has now distinguished himself by posing naked in a newspaper claiming that the solution to the national debt is for everyone in the United States to simply renounce money. He claims himself to be the "Founder of the Organization of United Renunciants."

Garry L. Scarff:

Scarff is a well-known and documented liar. He invents stories out of wholecloth to get media coverage. One of his better known lies was that his family had been killed at Jonestown. When his supposedly deceased family members were found alive and well and never to have been involved with Jonestown or Jim Jones, his claims were exposed as lies and he had to retract them.

Mr. Scarff has never been to Golden Era Productions. Nor, despite his fabrications to the contrary, has he ever been Church staff or a Scientology parishioner.

Hana and Jerry Whitfield:

The Whitfields' claims against the Church of Scientology were characterized by the California Superior Court in 1988 as "frivolous" and "devoid of facts" Their accusations were so vacuous that despite being allowed seven separate opportunities to state a set of facts sufficient to even bring a case, they were unable to do so. Their "$1 billion suit" was thrown out of court and monetary sanctions were levied against them. The court's ruling was unanimously upheld on appeal.

Jerry Whitfield is a former drug dealer and Hana has a history of mental instability and psychiatric treatment.

Neither of the Whitfields have ever been to Golden Era Productions and so have no knowledge of the matters that would be at issue in a trial.

Richard and Vicki Aznaran:

The Aznarans left the Church in 1987. They have no knowledge of relevant facts concerning Tom Cruise or Golden Era Productions and their credibility has been questioned by a United States judge.

On January 31, 1994, after reviewing in camera unredacted FBI documents relating to spurious charges levelled by the Aznarans against Church representatives, the Chief Federal Judge in Los Angeles, Manuel L. Real, ordered the FBI to determine what information in those records constituted evidence that the Aznarans had made false statements, either to the FBI or in sworn testimony. This investigation is ongoing.

The Aznarans have not been at Golden Era Productions since March 1987 and have no knowledge of any visits there by Tom Cruise.

Lawrence Wollersheim:

Mr. Wollersheim also suffers from a major credibility problem. By his own admission, he has abused LSD approximately 300 times and his own psychiatric experts have declared him to be mentally unstable.

Mr. Wollersheim has never been to Golden Era Productions. He left the Church in 1979. He is currently under investigation for spreading malicious lies about individuals and their families.

Scott Mayer:

Mr. Mayer left the Church of Scientology in 1976. He has never been to Golden Era Productions and has absolutely no information whatsoever concerning the issues at hand.

The facts given above are only a sampling of the information which demonstrates the fatal unreliability of Mr. Berry's sources. Due to these "witnesses" appearing after the case had been dismissed, they were not cross-examined. There is far more information that will be forthcoming, in the event of litigation, and again it seems unfortunate that you were unwilling to meet so you could be provided with the facts.

Mr. Berry, however, knows perfectly well that the numerous torts he and his hired witnesses have alleged are lies. In a self-betraying letter to Church counsel in March, he offered to have his paid-for declarants testify that they had never been aware of any criminal conduct on the part of the Church, notwithstanding their supposedly sworn testimony to the contrary.

We have provided the Mirror with abundant information demonstrating the falsity of the Mirror's articles and have explained why it would be a grave mistake for the Mirror to rely on Andre Tabayoyon as a source of information on Scientology and Tom Cruise.

I look forward to hearing from you.

Very truly yours,

Mike Rinder

Mike Rinder

cc. Gerrard Tyrrell
Harbottle & Lewis

Gerald Feffer
Williams & Connelly

GERALD ARMSTRONG

Armstrong is a former clerk for the Church of Scientology of California who, as part of his duties, was entrusted with the care of thousands of pages of personal records belonging to L. Ron Hubbard. In December 1981, Armstrong left the Church and took with him more than 10,000 pages of records belonging to Mr. Hubbard and the Church. This included 5,000 pages of original documents for which no copy was left behind.

As the custodian of confidential Church papers, Armstrong had a fiduciary responsibility not to disclose these documents to individuals outside the Church. In breach of this obligation, Armstrong loaned the documents to one Omar Garrison, an author who at one time had been retained to write a biography of Mr. Hubbard, a project which fell through. Armstrong gave these documents to Garrison not to assist him in writing the biography but to enable Garrison to deliver them to attorneys representing litigants involved in suits against the Church.

In April 1982, Armstrong also made contact with Michael J. Flynn, who was the lead attorney in more than a dozen lawsuits against the Church. Armstrong showed Flynn two private archival documents. Thereafter, from May until August 1982, Armstrong continued to give stolen documents to Flynn for use in Flynn's cases against the Church, even though the litigation did not involve Armstrong. Ultimately, Armstrong gave Flynn thousands of documents, including original and private Navy records and diaries of Mr. Hubbard from the 1940s.

On May 26 and May 27, 1982, the Church wrote to Armstrong demanding return of all the stolen documents, but Armstrong denied having them. Subsequently, however, Armstrong admitted that he indeed had possessed the stolen documents on those dates.

The Church sued Armstrong for the return of the documents. Trial began in the California Superior Court in May 1984. The Court received the testimony of Armstrong and his witnesses, many of whom were clients of attorney Flynn in other actions against the Church. These witnesses for Armstrong were permitted to testify as to Armstrong's purportedly imperiled state of mind. The Court did not permit the Church to present any of its own witnesses to rebut the testimony of hostile witnesses about Armstrong's alleged "state of mind."

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Judge Paul G. Breckenridge also heard "evidence" from Armstrong consisting of distortions, half-truths, and outright falsehoods, amounting to a justification defense that Armstrong had stolen the documents to protect himself in the event of "retaliation" by the Church. The result was a negative decision for the Church.

Since the case was heard, Armstrong has adopted a degraded life-style and developed some odd financial ideas. He is the self-proclaimed founder of the "Organization of United Renunciants." In November 1992, the Marin Independent Journal attempted to explain Armstrong's philosophy of life in an article entitled "Is money the root of problems?" The story featured a photograph of an apparently naked Armstrong, eyes closed and smiling, sitting in a lotus position embracing an enormous globe.

According to the article, "Gerald Armstrong has an idea for dealing with the national debt -- write it off. Forget it. It doesn't exist."

"It's that easy.

"The novel prescription for fixing the fiscal fiasco is only part of Armstrong's larger message that money should be abolished ... Armstrong can count only a handful of friends as converts, but he is trying to get the word out. Detailed proposals have gone out to Bill Clinton, Ross Perot and Pete Wilson (no one has tapped him for an economic advisory post just yet). He has also written to the New York Times and other mega-media.

"Ted Koppel has not called."

Armstrong's ideas include "no more pay checks, no more loan payments, no more taxes, and forget that $20 you owed your brother-in-law." **SECTION 1**

Today, Armstrong is hooked up with Cult Awareness Network, which is primarily a referral agency for those who engage in the illegal activity of kidnapping adults for the purpose of forcibly persuading them to abandon their religious beliefs. In November 1992, Armstrong attended CAN's convention in Los Angeles. He has the ear of Priscilla Coates and appears to be on excellent terms with CAN's leadership.

Armstrong Plotted to Take Over Church Assets

Since the trial, the Church has discovered new evidence which was completely unavailable in 1984.

This evidence shows conclusively that Armstrong's "justification" defense was a sham and a fraud. He was not remotely in fear of retaliation by the Church and was actively plotting the Church's downfall.

Armstrong considered the materials he had stolen useful not only as a lever against the Church and Mr. Hubbard in ongoing litigation with Flynn's clients, but he also sought to use the materials in pursuit of his plan to undermine the Church for his own financial benefit.

As part of his plan, Armstrong actively sought out Church staff members who would be willing to "defect" and assist him in discrediting Church leadership. After leaving the Church, he contacted Church member Daniel Sherman to enlist Sherman's aid in attacking the Church. Sherman, without Armstrong's knowledge, consulted Church staff for advice. It was decided that the Church would obtain authorization from the Los Angeles Police Department to make "undercover" videotapes of Armstrong's conversations with Sherman and any other Church dissidents or defectors.

The police authorized the investigation and videotapes, at which point Sherman embarked on an effort to ascertain the full extent of Armstrong's intentions.

Sherman informed Armstrong that a group of staff members who were dissatisfied with Church management might be interested in working with him in his efforts to undermine the Church. This wholly fictitious group was dubbed "the Loyalists."

Sherman enlisted the aid of two other persons, David Kluge and Mike Rinder, who agreed to pose as "Loyalists" and meet with Armstrong. Kluge assumed the code name "Joey," and first met with Armstrong in the late summer of 1984.

Armstrong told "Joey" that part of his plan was to use the auspices of the Internal Revenue Service to attack the Church. Armstrong wanted "Joey" to plant in the Church's files the documents Armstrong would fabricate, so that Armstrong could tell the Criminal Investigation Division (CID) of the Los Angeles IRS office to conduct a raid and find the "incriminating" documents. He reassured "Joey" that he would be able to create the needed documents "with relative ease" since he had done "it for a living."

Armstrong also explained to "Joey" how he intended to go about forging the new documents, based on his experience:

ARMSTRONG: "So it seems to me that the use of the communication lines, I don't know maybe you guys are using them, but it seems to me that you don't have a way of printing anything to get an issue on the lines, used for anything. Right? I'm saying that I can do it. I can type those goddam things and duplicate them and make them look exactly the same. You can't, you would not be able to tell the difference."

Armstrong also made it clear that he had developed a personal program intended to undermine and eventually destroy the Church. His goals were to oust the current management of Scientology, to obtain an advisory position within the restructured Church by becoming a consultant to the "Loyalists" and to plunder the Church for his own financial gain. His program to remove current Church management included the filing of a civil suit, based on evidence that he would manufacture. In a conversation with another co-conspirator, who, unknown to Armstrong, was still faithful to the Church, he insisted that the suit could be launched based on manufactured allegations.

ARMSTRONG: "They can allege it! They can allege it! They don't even have - they can allege it!"

MIKE: "So, they don't have to -- like, they don't have to have the document sitting in front of them, and then. ..."

ARMSTRONG: "I'm f-king saying the organization destroys the documents. ...!"

MIKE: "The point -- the point I'm trying to get across is that that's not criminal. That's the -- that's the civil complaint in there and that would have to be proven."

ARMSTRONG: "Show me the lines you're talking about."

MIKE: "Well, it's over here."

ARMSTRONG: "Where are the -- we don't have to prove a goddam thing. We don't have to prove sh-t. We just have to allege it. **SECTION 2**

At other meetings between Armstrong and his "co-conspirators," Armstrong described in detail his plans for bringing about the collapse of the Church so that he and the other "Loyalists" could move in and take over. Armstrong's goal, as revealed in his own words on videotape, was to overthrow existing Church management and to set up in its place a new set of Church executives who would settle all of the civil damages suits brought against the Church by the attorneys representing Armstrong. His plans included wresting control of the Church, planting forged incriminating documents in Church files, to be discovered by a government raid, and blackmailing a senior Scientologist executive through attempted sexual entrapment. **SECTION 3**

In sum, Armstrong's plans consisted of:

A) Stealing documents from the Church to serve as models for forgeries. **SECTION 4**

B) Plotting the forgery of false incriminating evidence in Church files. **SECTION 5**

C) Orchestrating a coup in which agents of Armstrong and the U.S. government would take control of the Church of Scientology from its lawful management; **SECTION 6**

D) Suborning perjury in order to keep his conspiracy under cover. **SECTION 7**

Armstrong also worked closely with Michael Flynn and two members of the IRS CID, Al Lipkin and Al Ristuccia. In late summer or early fall of 1984, Armstrong contacted Sherman and explained that he and his IRS contacts had come up with a plan to create false documents and plant these on Church premises, where they would be seized in a CID raid. According to Armstrong the IRS agents wanted the "Loyalists" to plant covert electronic bugs in Church offices. Armstrong offered eavesdropping and special photographic equipment.

Armstrong informed "Joey" that the "Loyalists" would be placed in the federal witness protection program and would receive tax-exempt status in exchange for participating in the covert operation.

Armstrong instructed "Joey" how to lie under oath about their plans to disrupt Church management. Armstrong wanted "Joey," if deposed, to say that he and Armstrong had merely discussed a "global settlement" of Church litigation.

ARMSTRONG: "OK, what are our conversations, should it come down to it?"

"JOEY": "What do you mean?"

ARMSTRONG: "What do we talk about? You're deposed. You walk out there, and there's a PI hands you a paper, saying you're deposed, Jack, and not only that, you're out of the organization. And what do you say in deposition. Well, Armstrong and I talked about this, and he had a whole bunch of ideas about how to infiltrate the communication lines and spread turmoil and disaster, you know. What are we doing here? That's my question, before I tell you my ideas on documents."

"JOEY": "Well, what I got is basically -- Loyalists gotta -- we gotta move -- we've got the suit coming up and I guess we need other lines to get stuff going. ..."

ARMSTRONG: "OK. So as far as the doc ... Let me just say, ah, you and I get together, we get together because we have a goal of global settlement. You have felt that the turmoil and abuses and so on have gone on too long ... Hence we get together and discuss things. We have not discussed anything about a destruction of the tech, or Scientology is bad, or anything like that. Are we agreed?" **SECTION 8**

During one meeting with "Joey," Armstrong's alleged claim that he "feared" Church retaliation was revealed as a complete falsehood.

"JOEY": "Well you're not hiding!"

ARMSTRONG: "Huh?"

"JOEY": "You're not hiding."

ARMSTRONG: "F-k no! And ..."

"JOEY": "You're not afraid, are you?"

ARMSTRONG: "No! And that's why I'm in a f-king stronger position than they are!"

"JOEY": "How's that?"

ARMSTRONG: "Why, I'll bring them to their knees!"

New evidence of Armstrong's fraudulent intentions was revealed in a declaration of November 18, 1991, in which he admitted that he never intended to stick to the terms of the settlement agreement he signed with the Church in 1986. In his declaration, Armstrong asserted that he had read and understood the settlement agreement, but that he "put on a happy face" and went through the charade of signing it even though he told his lawyers that he never intended to abide by its terms. Armstrong's stated reason for signing the agreement in the full knowledge that he would violate it later is so that he could receive the "financial wherewithal" to "get on with the next phase of [his] life." **SECTION 9**

Armstrong's motives were money and power. This is also shown by a letter to Church attorney Eric Lieberman on June 21, 1991. Armstrong wrote that he had been asked to testify against the Church in a case in South Africa. He laid out specific terms for the settlement of that case. **SECTION 10**

The Church later appealed the Breckenridge judgment and a decision was issued by the Court of Appeal in 1991. The Church had sought to introduce evidence showing Armstrong's attempts to organize a conspiracy to bring it down, but the Appeals Court stated that it could not accept the new evidence because it had not been a part of the trial record. The Court's decision upheld that of the lower court, but stated that Breckenridge's negative comments about the Church were to be taken to indicate Armstrong's state of mind at the time he stole the documents, and not for their truth.

Armstrong's state of mind is illustrated by various "literary" writings authored by him, none of which more clearly demonstrated it than a document now known as the "pig letter," in which Armstrong purported to describe a dream. **SECTION 11**

All the documents Armstrong stole have now been returned to the Church. As mentioned above, Armstrong never intended to abide by the terms of the agreement, which included staying out of other court cases involving the Church. Armstrong meddled in these and tried to prejudice their outcome. So, in 1992, the Church filed a new suit against him for breach of settlement. The Court entered an injunction preventing Armstrong from violating the settlement agreement by assisting anti-Church litigants. **SECTION 12**

During the trial in 1984, Armstrong had made numerous false allegations about L. Ron Hubbard, pretending to the judge that while in the Church, he had thoroughly researched Mr. Hubbard's life. However, Armstrong's incompetence as a researcher is well documented. Ironically, it was Armstrong's lack of research into the various facts and incidents regarding Mr. Hubbard's life that led him to his false claims.

In the court transcripts, Armstrong admitted to his own incompetence as a researcher. While being cross-examined concerning his "research" regarding L. Ron Hubbard's career as an officer in the Navy during World War II, Armstrong stated the following about himself:

1. He was never trained in how to research a

biography.

2. He never searched out and obtained official documents from any agency of the United States government.

3. He was not aware that there was an agency of the United States Navy that kept records of ships.

4. He never attempted to find out what data the Naval Historical Center had on the subchaser 815, the ship under the command of L. Ron Hubbard during World War II.

5. Armstrong concluded that Hubbard was not a Commander of a squadron of Corvettes as he did not do the necessary research to locate the documents in Navy files which established that Hubbard was in command of a squadron of Corvettes (English term for subchaser). Armstrong was not even aware that the initials SC stood for Submarine Chaser.

When questioned during the trial on evidence substantiating Mr. Hubbard's combat record, Armstrong admitted that he merely "went through some books on the subject. But that was it. I never went to D.C. And I obviously never checked the sources that whoever did this research was able to check. So I stand corrected."

SECTION 13

Armstrong also challenged Mr. Hubbard's claim that he (Mr. Hubbard) had been made a blood brother of the Blackfeet Indian tribe. Yet just recently that nation celebrated Mr. Hubbard's 70th anniversary as a blood brother.

A reliable account of Mr. Hubbard's career in the Navy is given by L. Fletcher Prouty, former senior U.S. intelligence officer with the Pentagon.

Mr. Prouty, who joined the Army just a month before Mr. Hubbard joined the Navy, is experienced in reading and understanding military and intelligence records. There is an intelligence process called "sheep dipping," wherein additional or cover files are created which mask the true activities of the intelligence operative. Mr. Prouty's knowledge is based on firsthand experience in creating such files.

His analysis of Mr. Hubbard's files shows that there are at least two and more likely three separate and different files in existence: a "false" file created by the Navy; a personnel file; and a file which contains Mr. Hubbard's true activities as an intelligence officer. It is this last file which appears missing and therefore there is an incomplete record of Mr. Hubbard's career.

Detailed examples are provided in Mr. Prouty's affidavit. **SECTION 14**

Regarding Mr. Hubbard's medical history, Mr. Prouty points out that Mr. Hubbard's Notice of Separation paper indicates he was awarded the Purple Heart twice. The Purple Heart is awarded only to those wounded in action.

Another document from the U.S. Naval Hospital in Oakland covers Mr. Hubbard's condition following the war:

"Eyesight very poor. ... Lame in right hip from service connected injury. Infection in bone. ... All service connected."

In sum, Mr. Hubbard's past is exactly what he stated it is.

Mr. Hubbard's achievements completely belie Armstrong's allegations. Through hundreds of books and literally thousands of articles and lectures, L. Ron Hubbard communicated and taught the methods which today are used by millions to improve their own lives and the lives of those around them. His career spans more than 50 years during which he produced more than 530 published works which have sold more than 100 million copies in more than two dozen languages. In developing the religious philosophy of Scientology, he delivered and recorded 6,000 lectures. In country after country, he has received wide acclaim for his accomplishments in bettering mankind.

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SECTION 3

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GERRY ARMSTRONG VIDEO TRANSCRIPT

FOR 17 NOVEMBER 1984

(Entered as evidence into the
Christopherson Case on April 1985.)

(Following is a video tape recording transcript made November 17, 1984.)

VIDEO TAPE RECORDED TRANSCRIPT

MR. ARMSTRONG: How are you doing?

MR. RINDER: Very good. How are you?

MR. ARMSTRONG: Not bad.

MR. RINDER: Finally. Documents. Are you going to give that back to me?

MR. ARMSTRONG: If you like.

MR. RINDER: So? Here I am. Now, I guess you are probably going to want a little bit about why me, but the reason that I wanted to meet you is because we are a little concerned at this point about the fact that, you know, stuff being relayed through this relay point and that, you know, there may be some misduplication and that kind of shit -- and I want to get the straight scoop from you. I also -- I brought this draft of the suit. There's some points in there --

(End of first video tape.)

MR. WADE: For the record, 897 begins now.

(Defendants' Exhibit 897 video tape played. Following is a transcript of that recording.)

MR. RINDER: I need it more than you do, I think. So, here I am. Now, I guess you are probably going to want to know a little bit about why -- why me, but the reason that I wanted to meet you is because we are a little concerned at this point about -- the fact that -- you know, the stuff being relayed through this relay point and that -- you know, there may be some misduplication and that kind of shit, and I want to get the straight scoop from you. I also -- I brought this draft of the suit. There's some points in there -- well, I have a little concern about some of those, about how we are going to handle that; if we were to go ahead and bring that, how it would actually come off. You know, at certain times we really need to -- to get the real scene, you know, what's really going on, so I'm going to -- I have a (inaudible). Joey doesn't have that. So I can then be a more direct relay point, because this has been going on now for some time.

MR. ARMSTRONG: There's a lot of things I would like to work out, which I think would make things go along a lot easier. First of all, the complaint, itself, that's not set in concrete.

MR. RINDER: No, no, I understand that.

MR. ARMSTRONG: And a lot of issues keep

coming up which kind of broadens the whole thing, as far as I'm concerned. The last time I met with Joey it was with the girl, and at that point I was basically given a go ahead to locate an attorney. I don't know if you guys have an attorney, I don't know what the status of that is. However, when, apparently, the money fell through -- well, whatever happened, I did not have the name of the attorneys. And I would be willing to do that, but that's kind of a last thing I was left with.

My understanding is it's sort of up in the air the whole thing. And that's okay. I don't have any compulsion to do any of it. But, you know, in my opinion the organization is in a state of transformation and it has to be altered. It is altering itself. We happen to be in a situation right now where, you know, something good can come out of it. That's philosophically where I stand on it. I don't want to continue on a legal battle against anyone.

MR. RINDER: That's exactly what our position is on that. That is really the common interest that we have with you.

MR. ARMSTRONG: Everyone has -- you know, as an aside, that viewpoint is being assumed on the why I mentioned in the last note. I hope you guys get these things.

MR. RINDER: That's one of the things that I don't know, that everything that you said is being relayed correctly.

MR. ARMSTRONG: You know, I am only a relay point in this thing. You know, however, I do make it -- you know my purpose to create as much shit as possible. You know, since I have --

MR. RINDER: Shit for the organization?

MR. ARMSTRONG: I do whatever I do; I have no -- I'm not hooked into anything. Anyway, I mention that, you know, there are many PR aspects to it. And the PR things can be so well done that -- you know, Scientologists, because they have had it drilled into them, tend to believe. They are believers.

Anyway, that's why I mentioned get off-policy actions. Anything, any little detail that you can find that the top has done off old accepted policy that they are doing off now, you know, hidden data lines, use of PIs, anything you can find. Then you've got the organization behind you, because they are off policy. Include it in the lawsuit; include it. They are not doing what's best for Scientology, because they are violating the policies. They are operating it autonomously and they are not operating to the best -- for the good of the group.

There is a lot of those things that have to be worked out that make the complaint very strong. You know, no one has any idea if the thing will be pulled off. No one. You can't tell five seconds from now what's going to happen and to have to have a sure thing, well, we can wait until the cows come home.

MR. RINDER: Yeah, I got that point.

MR. ARMSTRONG: It's going to take a Che Guevara, it's going to take some asshole to stand up and say, "Fuck it. Enough of this shit." You know, it's going to take that.

MR. RINDER: They will have to be in a strong enough position prior to that to be able to stand up and get anybody to hit them. Do you see what I am saying? You know, it's like --

MR. ARMSTRONG: Do you have anyone like that? You know, there's two different positions. You know, there's -- one is the public relations position and one is the organizational position. You may not be in the organizational position, but what kind of position are the people going to be in if a whole shitload of them are indicted? That's not going to have a lot of --

MR. RINDER: That's the thing. That's kind of -- That's how that ties into this, because that would weaken those people who are in those positions right now, that have that authority to call a meeting of old stock and let them all stand up there and say, "Look. There's a bunch of assholes and I'm going to get them."

MR. ARMSTRONG: You guys have the same possibility.

MR. RINDER: Yeah, it's a possibility.

MR. ARMSTRONG: You know, it could just be done. The whole -- You know, if you guys concentrated only on the CSC, on the blue building. Divide the damned thing up and just, you know, the day that the thing happens, you know, the day you file your complaint, then just call everyone and say to the meeting, "I don't know the positions of the people or if they are in positions of strength, if they are accepted in the organization or --

MR. RINDER: They're not all dishwashers, obviously.

MR. ARMSTRONG: — you know, somewhere in between. They are obviously not in ASI.

MR. RINDER: Right. That's not the organization anyway.

MR. ARMSTRONG: Right. But not only that, you are going to get people on your side. How about if one of these days -- you know, let's say that at a given hour a whole bunch of people were to pitch up on the doorstep?

MR. RINDER: Where at?

MR. ARMSTRONG: Wherever you wanted them. Suddenly you have got numbers. Suddenly you have got a lot of people crowding into Lebanon Hall to hear lectures, to hear talks, to hear the announcement. Then you may have numbers on your side.

MR. RINDER: Right.

MR. ARMSTRONG: There are a lot of people on the outside. And potentially the whole thing could

MR. ARMSTRONG: Yeah.

MR. RINDER: -- they gotta be -- we've got to check them out and make sure they're factual allegations.

MR. ARMSTRONG: That's what Mike has been saying all along. How much does the organization spend on PIs? How much has the organization paid Ingram?

MR. RINDER: I don't know.

MR. ARMSTRONG: How much have they paid Peterson?

MR. RINDER: I don't know. I don't know how much. I don't know how much --

MR. ARMSTRONG: Are you able to get that kind of information?

MR. RINDER: We may be able to. We may be able to get that. But, see, that gets into this question of then, is that -- is that a suit that is going to win? Is that a suit that's going to get us into a position where we actually come out on top?

MR. ARMSTRONG: You can win.

MR. RINDER: I mean, I don't know what the defense would be to that.

MR. ARMSTRONG: We had to do it because you are being attacked.

MR. RINDER: It's not illegal and not a loss. I see that as being a very -- a very -- it's a gray area and it would depend a lot on the public opinion that is generated surrounding that. You know what I mean?

MR. ARMSTRONG: Well, there is two things in it --

MR. RINDER: It's a legally arguable --

MR. ARMSTRONG: If you get my note which explained that you can proceed, you can make an issue of corporate control without alleging anything.

MR. RINDER: I don't follow that.

MR. ARMSTRONG: Well, there are hundreds of lawsuits. That's generally what lawsuits -- you know, a lot of times a lawsuit has that form, it is simply disagreement over who has control of corporate funds. That is simply the issue there are alleged there was any criminal misconduct or illegal use of the funds or anything.

MR. RINDER: So this is alleging it.

MR. ARMSTRONG: That's right. The reason for that is because with that, if you can get any of those things, then you -- then the Court can act immediately to freeze the accounts.

GERRY ARMSTRONG VIDEO TRANSCRIPT

FOR 7 NOVEMBER 1984

(Entered as evidence into the
Christopherson Case on 10 April 1985.)

MR. JOEY: Yeah.

MR. ARMSTRONG: To ask the questions at this point before I digest this stuff, it doesn't make any sense to me.

MR. JOEY: Great, now --

MR. ARMSTRONG: But --

MR. JOEY: -- I need to know, like, what your strategy is regarding these type of things and what we are looking at doing.

MR. ARMSTRONG: Well, I got a view, of course, from you, of course, that someone at least considered that I HELP was, you know, their Achilles heel, as it were. So we thought, "Shit, shouldn't I get some I HELP materials?" So hence I asked. Now issues, I wanted to know, number one, how they're run off, what the type face is like. Are these like this? You know --

MR. JOEY: These are the real McCoys.

MR. ARMSTRONG: You see, because I think that during a part of this, we can simply create these. You know, I can create documents with relative ease, you know; I did it for a living.

MR. JOEY: Great. So what kind of stuff are we going to want to create and who's going to get it?

GERRY ARMSTRONG VIDEO TRANSCRIPT

FOR 7 NOVEMBER 1984

(Entered as evidence into the
Christopherson Case on 10 April 1985.)

(Court reconvened on April 10, 1985 at 9:48 a.m.)

MR. COOLEY: Your Honor, just in the event the Court might consider it worthwhile, I have had enough transcripts of the tapes done to give one to each of the jurors and to the Court and to Counsel.

THE COURT: I don't think the jurors necessarily need one. I think Counsel should have one to go along.

MR. WADE: And copies of the tapes.

THE COURT: The record should also indicate Mr. Gutfeld did deliver five boxes of materials this morning. They are right over there, three of which are marked attorney/client privilege, two are not marked. Pursuant to the order of yesterday, they were delivered this morning.

MR. McMURRY: Thank you, Your Honor. May we have the opportunity to go through the unmarked, unprivileged two, boxes over the noon hour or break?

THE COURT: Let's take that up after we get this started. I was going to do it, but we will talk about that. I want to get going.

MR. COOLEY: Would you like a copy of transcript, Your Honor?

THE COURT: I have only seen them twice.

MR. JOEY: Right.

MR. ARMSTRONG: Right? So you originate policy and in the CSW, put all the relevant information. You retain the CSW and you send up the -- the proposal to the people up top. The people up top are going to do whatever they do -- depends on what you intended when you submitted the issue.

MR. JOEY: So you can affect attorneys and --

MR. ARMSTRONG: You can affect the whole damn thing. You can cause a policy change. For example, regarding the use of PI's, there's a -- Hubbard says in his old issue, "Use our own people; don't use outside people." Well, that's going to hurt. That's going to trap Hubbard, you know. So, in fact, we have to change that policy. And you can put in your CSW the risks that are being run. For example, if it's -- anyway, you can say -- and this is a problem that they run into, the PI's overstep their bounds -- right? -- and they know it.

MR. JOEY: I don't know that. I mean, legally, I never -- it's like, you know, attorneys --

MR. ARMSTRONG: See, again, I can't tell where you people are positioning to know what in the organization. You know where I'm coming from. In other words, you're not going to have, for lack of any other post, the dishwasher originating issues regarding PI's.

MR. JOEY: I want to give you the really good news. Are you ready for this? You're not talking dishwasher, we're not talking dishwasher.

MR. ARMSTRONG: Operation Long Prong?

MR. JOEY: Two members of the Board of Directors. Closed.

MR. ARMSTRONG: Closed. Holy -- You can do one -- you've got two, two board members? Have they already signed up undated resignations?

MR. JOEY: I'm sure that's standard.

MR. ARMSTRONG: But they can invalidate them. Let me -- Let me make a note of that. Okay? Because I'll ask Mike on that. It's a legal point. Okay.

MR. JOEY: So we got these and we got ideas on how to change them.

MR. ARMSTRONG: They're just a lot of ways I think that you can --

MR. JOEY: Colors and stuff.

MR. ARMSTRONG: Exactly.

MR. JOEY: You know how to do all that. Change them and --

MR. ARMSTRONG: Well, I think that it is possible. I think a lot of things can be done. I don't propose to. I can't go within a mile of the organization, obviously, so I can't be stuffing things into their comm basket.

MR. JOEY: Oh, Yeah. There will be helpers involved. I want to show you this thing. Now, this was from the I HELP --

MR. ARMSTRONG: Yep.

MR. JOEY: -- and got shredded and we put it together.

MR. JOEY: You know who's handwriting that is?

MR. JOEY: No. Anyway (inaudible) channel all money flows, I HELP, thereby, dada, and it's talking about the money and I HELP. But why I keep bringing up the legal thing, there's a thing here, handling something, each country's laws, so it looks like it's going to be run by attorneys. You know what I mean. I don't want to give that up. It's not broad -- you can look at it.

MR. ARMSTRONG: What's the date on it, do you know?

MR. JOEY: It's new. 6 September --

MR. ARMSTRONG: -- '84. So I HELP is a thing that's going on.

MR. JOEY: The only thing I can give you, it gives you what the initials stand for, something about counseling or something.

MR. ARMSTRONG: Fine. Fine.

MR. JOEY: Don't know whose that is?

MR. ARMSTRONG: Okay. Well, we won't worry about that right now.

MR. JOEY: You want to look at anything on that?

MR. ARMSTRONG: What we may be able to do is paste this down and then photocopy it again. If we could do it real well, we could turn it into a natural rather than a -- you know what I mean? Glue the sucker really well and rephotocopy it -- and hopefully these are never picked up -- and then join the whole thing back together, just sort of crimp it a little bit because the scorching has turned the edges up. Looks real good. I don't understand it all, yet (inaudible).

How do your people feel about -- about the organization, like where they're at? Like, do they feel they're going to weather this storm? Like they're getting more powerful? Or that, you know, they're so firmly entrenched that only this plan of attrition is going to at all move things along?

MR. JOEY: Well, we're looking very seriously at actually filing that suit. And one of the things we want back from Michael is what the timing of that should be, see. We have it working in both directions. (Inaudible.)

Now, I'll give you this whole thing, all I've got here, the pledge. You wanted the pledge; right?

MR. ARMSTRONG: Yeah.

Who are these people? David Miscavage? Vicki Aznaran? Heber Jentsch?

MR. JOEY: Here's a policy letter. I want you to do something with policy letters.

MR. ARMSTRONG: Sure.

MR. JOEY: The whole thing was passed out. That's the name of the group and their address and their magazine. They've all these commendations and things that Hubbard's gotten, certificates, international who's who in lecturing. What do you think about all this?

MR. ARMSTRONG: He's gotta go down in history as the greatest con man of all time. What fraud.

MR. JOEY: What do you want to have happen to him?

MR. ARMSTRONG: To have happen to him, I'd

MR. JOEY: I was looking at all this.

MR. ARMSTRONG: Oh, anyway, just be aware of that possibility. And I think that --

MR. JOEY: That -- that if I went down and talked to him -- I wouldn't go there, first of all --

MR. ARMSTRONG: No, no.

MR. JOEY: Too many Scientologists around.

MR. ARMSTRONG: No, I wouldn't say go there. Call him and make arrangements so that he can talk to you people. That's what makes sense. And it makes sense that --

MR. JOEY: Think he might arrest me?

MR. ARMSTRONG: Him? For what? Oh, no, no.

MR. JOEY: Church of Scientology --

MR. ARMSTRONG: Oh, no, that he --

MR. JOEY: They know where I'm coming from?

MR. ARMSTRONG: Well, you know what would make sense? It would make sense in my opinion to make the contact through me so that he knows that you are part of the people that I've talked about. That makes sense. That would save you any problem in terms of identification because they are leery of entrapment.

MR. JOEY: Great. Great. One of the things

I want to ask, Lyman Spurlock --

MR. ARMSTRONG: Yes.

MR. JOEY: -- and Carol? I told you about Carol?

MR. ARMSTRONG: No.

MR. JOEY: Oh, good looking girl. Got a plan on that.

MR. ARMSTRONG: Oh, is -- is Carol the name of the girl?

MR. JOEY: Yeah.

MR. ARMSTRONG: The name of your girl? Oh, Carol. I -- see, Carol is his wife's name, but they've had such a rocky marriage, it's been like off-and-on divorce as long as I've known the guy since '77, so I just thought he's a possibility. I didn't know Carol, but thanks anyway. No, he told me that a real good looker I thought, God, this is, you know, an absolutely perfect opportunity because I think that -- that -- the way to the man's mind is through his cock. And -- and those people especially. I mean, none of the people in WDC are -- are -- you know, ASI, none of them have, like, a lot of brain power. You know what I mean. They're not intellectual giants. And they definitely had rather, shall we say, Philistine tastes. And, you know, there are a lot of good looking women with Philistine tastes, if you know what I mean. It's a possibility.

MR. ARMSTRONG: You were going to say something? Did it happen?

MR. JOEY: No. So we say, you know, if he gets set up with her --

MR. ARMSTRONG: You know, if she's a good actress. You know, I was wondering about the E-Meter today. You know, it seems to me that the E-Meter reads if you don't know your story real well. If you've got your stories down, I don't think there will be any problem. And I think she -- I mean, I would like to have the opportunity to sort of (inaudible) some of this off. I just think you guys -- I don't know if it's been tried before, but there's definitely a way to get to the top. That's been known in high political circles for a number of centuries. That could be a lot of fun.

MR. JOEY: What time do you have to leave?

MR. ARMSTRONG: Now.

MR. JOEY: You don't --

MR. ARMSTRONG: What else? Do you have some specific questions?

MR. JOEY: Yeah, a couple of things. You can

MR. ARMSTRONG: The fact that organized -- number one, there is -- you have to say there is a conflict, a disagreement about control of funds. Number two, we are requesting the assets be frozen immediately. And the reason is this, this, this and this. Organization that is supposedly a religious organization, is spending nonprofit funds to destroy someone's reputation. They are paying private investigators millions of dollars to destroy someone's reputation. Fabricated evidence. You can allege that.

I have a lot of faith in Mike Flynn. You know, I really don't know one way or the other whether or not that the Tamimi thing is bullshit. But I have also spoken to the U.S. -- Deputy U.S. Attorney in Boston, and everything I get from anyone is they are going on the basis that it's bullshit and will uncover it sooner or later. They are trying to extradite Tamimi right now.

MR. RINDER: That'll be a real PR coup.

MR. ARMSTRONG: And I'm saying, you guys can allege it. Also, I mentioned to Joey last time, I don't think anyone has to get in a frame of mind where if they don't file this thing two days following the indictments, like they have to take a

SECTION 4

GERRY ARMSTRONG VIDEO TRANSCRIPT

FOR 9 NOVEMBER 1984

(Entered as evidence into the
Christopherson Case on 10 April 1985.)

MR. ARMSTRONG: No.

MR. JOEY: Great. I got this. This is good.

MR. ARMSTRONG: By the way, I'll never admit that anything comes from Michael, including any complaints which I may have drafted.

MR. JOEY: Why is that?

MR. ARMSTRONG: Because that's how I've got to approach it.

MR. JOEY: Okay.

MR. ARMSTRONG: Did they understand all this?

MR. JOEY: I think so, yes.

MR. ARMSTRONG: Jesus Christ.

MR. JOEY: Oh, I just lost something. I'll get it.

We need a rock, I think. We need a rock to hold on to this.

Got it all. Got it all. Got it all.

MR. ARMSTRONG: When will we see the lady?

MR. JOEY: Oh, in a little bit. Let me finish this up here. I want to go over (Inaudible.) what you went over with Danny yesterday on those doc ideas. I saw Danny real briefly; he handed me this thing and briefly told me he had a little trouble yesterday and he said he went over some doc ideas.

MR. ARMSTRONG: The doc ideas were simply which issues are put. There's an absolute frontal attack. I mean, I got this issue, the one on me and the other five, and I think it's important, because what happens outside is that all of a sudden these people kind of rally together. So there's ways that stuff that's written can be used. The specifics of it, in a way, you guys would have to work out.

MR. JOEY: So I guess an issue's put together like an assessment, survey.

MR. ARMSTRONG: I tell you what, within the next twenty-four hours I'll give you an idea. I'll write something and we can just toss around how can it be used.

MR. JOEY: That would be great, that'd be great.

MR. ARMSTRONG: And once you've -- here's the way I potentially see it. Let's say that this woman did decide to back this thing and she figured that might as well do something with my life, might as well get off the great rich fence and grovel with the boys for a awhile, and what if she decided and she said, "Well, shit. I'm going to finance some of this."

Well, we could set up a press and we could produce issues and then we could set up a network and we could communication lines running outside the organization. And you could create a pool of information just as an immediate thing, we get ourselves -- you guys get yourselves an attorney and work out the exact legal things to be done.

Oh, by the way, I spoke to Al Lipkin last night after I was photographed. I went down and saw him because we had talked, and I had told him, "It looks like, just maybe, one or some of these guys are going to want to talk with you." And he was, you know, to some degree, elated, but they never say anything. I told him at that time, I said, "In my opinion, the organization at the top is potentially very fanatic and people could get hurt. If these people that I'm in touch with are brave enough to stick their neck on the line and say, "Enough of the bullshit, okay." So I said, "I'm not saying that this is going to happen. I'm not saying that there's going to be bloodshed, but I think that you guys ought to be aware enough that this is going down or potentially it is, so that you've got some things worked out in advance."

And he's smart enough. He already talks about safe houses and relocating and renaming people. But I said, "Well, I don't know what can be done." He keeps asking me, "What can be done?" I say, "I don't know." But I think as an initial thing, what makes sense to me is that the people who are going to put their names on that document --

MR. JOEY: The suit?

MR. ARMSTRONG: -- on the suit, see you in advance, because as soon as that happens, they become Federal witnesses and the organization's not going to fuck with them. Or if it does --

MR. JOEY: That's what Al said?

MR. ARMSTRONG: That's what I said. And he said, "That's the best protection that they've got initially." He said, "You know, beyond that, let's just keep in touch on a real close basis."

I called him last night after work because I had some more thoughts, and I called him again this morning, you know. I'm on the phone to the guy real tight, and I don't know, but they're the best the government's got to offer, you know, and if the government of the United States can't take on these little assholes down there, we're really in deep kaka.

MR. JOEY: Got it. Okay. Let's finish on the documents and then get back to Al Lipton. Where were we on that?

SECTION 5

should know that is going on. Now, maybe Jordan's in your pocket; I don't know, I have no idea. But I wanted to pass that on.

MR. JOEY: Jordan's not a loyalist.

MR. ARMSTRONG: He's not?

MR. JOEY: No. I don't know everybody but --

MR. ARMSTRONG: Okay. So far as the doc -- let me just say, you and I get together, we get together because I have a goal of global settlement. You have felt that the turmoil and the abuses and so on have gone on too long; hence we get together and discuss things. We have not discussed anything about a destruction of the tech or that Scientology is bad or anything like that. Are we agreed?

MR. JOEY: Yeah.

MR. ARMSTRONG: There's a radio. That's a state car.

So it seems to my that the use of the communication lines -- I don't know, maybe you guys are using them, but it seems to me that you don't have a way of printing anything to get an issue on the lines, used for anything; right? I'm saying that I can do it. I can type those goddamn things and duplicate them and make them look exactly the same. You can't. You would not be able to tell the difference. You know, maybe under a microscope you can tell the type of faces, you know, this ones got a little crack on the T and this one doesn't. You'd be able to tell that and they will know. But that happens to be -- that only happens to be one little piece of it. You put out another issue the next day for a totally different purpose. You guys are going to need to put out issues when this thing happens, you got to inform the crew. You should be preparing right now, in my opinion, goddamn affidavits that I can be -- that we can put into a computer and have run off and ready to go. I can write -- I write legal shit; that's why I want to know your best legal mind. I'd like to talk to him. Maybe you're it; I don't know.

MR. JOEY: I'm not it, no.

MR. ARMSTRONG: Okay. But I'd like to, so we're really in sync on this thing. Same as the overall best mind. I have no compulsion to -- you know, I'll talk to them through -- around the corner. I don't have to see anybody. But I really want to know that we are in sync and that we're using all the resources that we can. I don't know what you've got. I'm telling you basically what I've got. One thing I have got is mobility.

SECTION 6

GERRY ARMSTRONG VIDEO TRANSCRIPT

FOR 17 NOVEMBER 1984

(Entered as evidence into the
Christopherson Case on April 1985.)

guys are concerned. Right? You get a new recruit into the fold. It's a PR campaign.

MR. JOEY: Like these issues and PR campaign are going to disrupt the Church and turn it into management.

MR. ARMSTRONG: Well, those things, I leave that up -- obviously you guys are in a better position. Christ, you know the game far better than I do. If you want to agent provocateurs, you're the artists. You can probably "do what thou wilt" along those lines. I don't think I have to give you any instructions, but I do think that you know we sit at a particular crossroads of history relative to the Organization and, damn it, we should be able to act, I think. You know? And cause our own destiny here, instead of sitting back and waiting for it to happen. The adrenalin rush. But actually, I can do without that shit. Hence, I'm involved. I keep hearing those things all around, man --

MR. JOEY: All right. All right.

MR. ARMSTRONG: You know I'll probably have more questions. I always have a lot of questions later. Oh, the other thing, I don't know if it makes sense to you to sort of divide up the Organization and go after people on that basis.

Just so that you know, shit, we have this group covered. And then divide it up structurally so that you have all the various key points which have to be covered. I think that you guys will be able to take over and then use operating income to continue the battle. And that way you can secure the buildings, take it over, and I think that it's going to take that kind of thing, a lot of people, by the way.

MR. JOEY: Like game plan. Like you want the global settlement, like you say, working together. It'd be like our people running the Church, getting these guys out of the way.

MR. ARMSTRONG: Sooner or later someone's going to have to settle.

MR. JOEY: Yeah.

MR. ARMSTRONG: Like if you guys decide, "Fuck you," just continue on. It really doesn't make any difference. I have my lawsuit and I'm going ahead on that. And that keeps me involved, you know, in addition to everything else I do, and that's going to pay off sooner or later and I'm going to assist wherever I can in bringing this goddamned dog to bay, because I think it's -- there's no fucking way you guys should have to go through searches when you walk in and out of the

GERRY ARMSTRONG VIDEO TRANSCRIPT

FOR 7 NOVEMBER 1984

(Entered as evidence into the
Christopherson Case on 10 April 1985.)

MR. ARMSTRONG: That's what we need to talk about.

MR. JOEY: Yeah. That's what I want to know. What's the input from Michael on it? How's it going to tie in with what he's doing and what the other people are doing and --

MR. ARMSTRONG: That's what we need to get.

MR. JOEY: -- and what do the agencies want on this?

MR. ARMSTRONG: Okay. Well, the agencies have asked for some specific things; that's all they've asked for. Now --

MR. JOEY: Let me take notes. What have they asked for?

MR. ARMSTRONG: Well, they've asked for specifically, now, some of the things you've already asked for and I've already passed on. The names that they mentioned: Marlowe, Reynolds, Doug Hay -- we talked --

MR. JOEY: Now, who wanted this?

MR. ARMSTRONG: CID.

MR. JOEY: Got it.

MR. ARMSTRONG: Now, do you want a number in CID?

MR. JOEY: Yeah.

MR. ARMSTRONG: Your people should call. Any problems, just call this guy; he's, in my opinion, a pretty straight guy.

MR. JOEY: He knows about the Loyalists, what we're doing, stuff like that?

MR. ARMSTRONG: Yeah. Basically, yeah.

MR. JOEY: What exactly have you told him and what did he say?

MR. ARMSTRONG: I've told him -- well, he feels that -- he keeps saying, "When are these guys going to talk to me? I'll meet under any circumstances."

MR. JOEY: Wow.

MR. ARMSTRONG: He wants to talk. You know, wait a -- let me get -- "Al Lipkin, 213-688-4260. At night" -- (Inaudible.)

This is really great. How far is the track? Is it a long thing?

MR. JOEY: I think -- (inaudible.)

MR. ARMSTRONG: "At night, 688-4151." I believe that's --

MR. JOEY: That's his home?

MR. ARMSTRONG: I don't think so. I believe that's how --

MR. JOEY: This is CID?

MR. ARMSTRONG: Yeah. I believe that's how he can be reached. I'm taking a fuck of a chance doing this; so are you. But there's a lot of --

MR. JOEY: What does he need from me? What does he want? Or is it just backup for what I need?

MR. ARMSTRONG: Well, it ties in -- he would like to get everyone to talk so that they can move, but -- but at the same time, I always say to him, "Listen, your putting us in an uncomfortable situation. If your telling me you haven't got enough to move right now, and I'm giving you the testimony, then I'm a marked man if you guys back off the investigation."

He said -- The reason I do that is not because I'm particularly paranoid but because I'm searching for what's going on in their skull. He assured me the investigation is going forward. "We've got enough; that's the way the government works."

MR. JOEY: Listen, the bottom line here -- I'm not aware of any crime the Church is committing right now. We've looked -- I mean, like, realistically.

MR. ARMSTRONG: How much are they paying PI's? Illegal expenditures. Illegal expenditures.

MR. JOEY: Great. Great. So what agencies know about us and what do they want and --

MR. ARMSTRONG: Justice Department, FBI --

MR. JOEY: You talk to these guys?

MR. ARMSTRONG: Yeah, I do. Yeah.

MR. JOEY: Like who in Justice? Is there a number I can call there?

MR. ARMSTRONG: Richard Greenberg. I gave you that one, I think. He's the guy you should call. I'll give you that number. He's in D.C.

Did the LA FBI case get dismissed?

MR. JOEY: (Inaudible.)

MR. ARMSTRONG: Okay. Uh, 202-633-3368. I gave you one for Tom Doughty, FBI in D.C.

MR. JOEY: What's his name again?

MR. ARMSTRONG: Tom. Thomas D. Doughty, D-o-u-g-h-t-y, 202-324-4532. I gave you CID. There's another guy in CID --

MR. JOEY: Yeah. Al Lipkin.

MR. ARMSTRONG: Al Ristuctia, R-i-s-t-u-c-t-i-a.

MR. JOEY: Is this Al, too?

MR. ARMSTRONG: Albert, yeah. 688-4261. It may be the same as the other one I gave you, I'm not sure. Al Lipkin? No the other one is sixty, okay?

MR. JOEY: Canada.

MR. ARMSTRONG: Oh, in Canada, you know, they have that thing "Project 20." The guy I've talked to a lot is Al Ciampini, 416-965-6138.

MR. JOEY: Who was he with, again?

MR. ARMSTRONG: He's just the Ontario Provincial Police. Michael -- Mike also thinks that the Florida Attorney General is going to bring some charges. The -- you know, the whole freedom thing. Mike got an indication from -- did I give you the name of the guy who's handling that investigation?

MR. JOEY: No.

MR. ARMSTRONG: The Tamimi investigation? Let's see -- Brackett Denniston. His first name is Brackett; last name is Denniston, D-e-n-n-i-s-t-o-n, and he's (617)223-2280. He's the Assistant U.S. Attorney involved in the Tamimi thing. And his last indication to Mike was: it is clear that an attempt to completely ruin someone's name with false information is a crime.

MR. JOEY: Got it. Okay.

MR. ARMSTRONG: So all you have to do is, again, take that viewpoint: "It's a crime," never been proven.

MR. JOEY: So what do these -- what's justice need from Loyalists, FBI, CID, how --

MR. ARMSTRONG: They'd like to talk to whoever knows about -- I'll tell you who wants to talk to you is CID. CID are the guys. That's the most likely -- absolutely the most likely place in which the whole thing will happen. Canada, you know, they're a little far away; they're going to move first. And perhaps it is an embarrassment to the rest of the U.S. people that the Canadians scooped them on the thing. You know, if everything goes right with the Canadians, they have to move by December 2nd. That's the cutoff date. If they don't by December 2nd, then that's all over, they give back the Toronto docs and --

MR. JOEY: So what do they want from us?

MR. ARMSTRONG: They want to talk to you people. They want -- yeah, there's two things. Number one, you guys should, I think, make plans, at least, in the event that the whole thing is blown, someone breaks or whatever, exactly how to handle it, because, you know, you can simply -- no one needs to be held. Don't go for it. Just walk out the door. And I don't know if they'd be stupid enough to try to fuck you over by holding you; maybe, but I doubt it.

MR. JOEY: We can put the CSW together. We can handle distribution.

MR. ARMSTRONG: That's exactly the sort -- the CSW is the greatest weapon you guys got. You know, the CSW about the situation with the PIs given that someone is in a position that they would be doing such a thing. I think, you know, how about if -- I've got a letter that says that Eugene Ingram works for L. Ron Hubbard, you know. Okay. Okay. Then you say, well, let's say you guys have the information somewhere that Bracket Dennison of the US Attorneys office felt that this whole thing was a setup and then you say, "Well, we can't have that problem. Here's this letter out there saying that he works for Hubbard. We can't endanger the source. We have to act." So thereof, here's my proposal. And just the fact of having that goddamn proposal of some guy standing up and saying, "I've got to defend source," you've got such incriminating information on the CSW. You follow? Even if they responded at all, they're acknowledging that this is -- that's true.

MR. JOEY: So we put a letter together saying that.

MR. ARMSTRONG: I'm saying a CSW, and you keep your copy of the CSW. They're going to come around hunting. "Where the fuck is it? Ah shit, got rid of it all." Except you've made it off the property and you've got it somewhere. Type it off the property and bring it in. Never there's no problem bringing stuff in. Right? You could bring stuff in and maybe you can't sit at your desk and type it; I don't know. I don't know the demographics and the geographics and anything else in the place, but it seems to me that it's a much more high-security deal than it was. Am I right?

MR. JOEY: Yeah, a little difficult. Just in getting things typed -- typing, your sitting typing and typing things out --

MR. ARMSTRONG: Exactly.

MR. JOEY: -- and someone walks in, "What's happening here?" What are you going to say?

MR. ARMSTRONG: But just maybe that sort of stuff can be done: issues could be created, stuff can go in. But I mean I'm not really saying create incrimination evidence of which there are no facts, you know, but just to write about the speculation. I mean, did you know that, that Ingram was retained by Lenske, Heller and Magnesson on behalf of Hubbard?

MR. JOEY: I know that the attorneys hire and pay and run the PIs.

MR. ARMSTRONG: Right. And isn't that off policy?

MR. JOEY: You gave me this thing here, yeah.

MR. ARMSTRONG: Yeah, that's a goddamned policy quote.

MR. JOEY: You see, but that's the whole thing where, you know, the PIs are run by the attorneys, paid for, so the attorneys are running them, you know, so how can you put out an issue saying, you know, fire the PIs, because it's the attorneys doing it -- the attorneys aren't going to pay any attention to the issue, you know what I mean? That --

MR. ARMSTRONG: I know. I know. But you've got to simply say, "Oh, fuck." This is off policy now. We've got to get on source, and source, that's the problem. You know you can. What are they going to do? Oh, no, you're off source for saying that you're on source -- I don't know -- I mean, it could be to that degree that they have such utter disregard for policy now that anyone who says this is off policy is just laughed at. Maybe that's the way it is. Policy-fuck. "We're the policy, asshole." Maybe they're that arrogant that they don't give a fiddler's fuck about source and all his tech, I don't know. I don't know what the situation is inside, you see.

You guys obviously have your hands on that pulse a lot closer than I do. I only see that potentially there's a tremendous use to which that -- which the communication lines could be put.

Anyway, let's continue on. I don't know if I've left you with -- I tell you -- within a day, I'll draft something.

MR. JOEY: See if you can draft something and we'll go over it again.

MR. ARMSTRONG: Good. All right. But there is the one thing which I think in advance of -- you know, within a day, just divide up the group so -- the organization, so let's say you've got thirty-five, let's say that in the particular organization that they're -- that they could possibly contact are five hundred staff. I don't know how many staff there are. A thousand? How many staff?

MR. JOEY: More than a thousand.

MR. ARMSTRONG: So they divide it up and you say, "Well, I can get this guy, this guy, this guy, and this guy, and it seems logical -- I'm working in LA Org, so therefore I'm going to go to LA Org staff, I'm not going to approach ASI people. Whereas, you don't want to anyway, because obviously they're not the ones you want to survey. But you want to survey at some levels down below in the organization. And that is simply a means of surveying without anyone -- in other words, the issue is the source of it and they can never tell where the issue came from.

MR. JOEY: Got to go with the PI thing, too?

MR. ARMSTRONG: Well, the PI is another -- yeah, I think that something should be done so that they can capitalize on getting stuff, number one, into writing; and number two, possibly unstablizing the whole PI/attorney apparatus. I passed onto Lipkin yesterday to go after Peterson, should go after him with fucking tooth and nails, because Peterson's probably been paid millions of dollars.

Oh, listen, let me give you names. Ah shit, I don't know if I brought them. Can you guys get amounts of money to PIs?

MR. JOEY: That stuff --

MR. ARMSTRONG: Can you get amounts of money to Peterson?

pledges and with that kind of -- that's pretty scary literature. It's fucking -- when you get these guys pledged without thought for personal comfort or safety, for fuck's sake, they're saying, "I'm going to go and I'm taking you with me, Jack." I mean that was a fanatic document. I gave that to the Feds already and I'm giving them the other --

MR. JOEY: What did they say? They thought it was fanatic, too?

MR. ARMSTRONG: Yeah, they thought it was fanatic. And -- but they can't do anything, but they are aware. They are aware. I drop the name Jonestown and they say, "Yeah, we don't want that." They don't say, "Oh, no, it will never happen." You know what I mean? It takes different forms. These guys are too sophisticated to try suicide as the resolution to their problems, I think, but they're not too sophisticated to try and take out some people.

That's what I think, anyway. All right.

MR. JOEY: Did you have anything else for me?

MR. ARMSTRONG: No, I think you've got it. The only other thing was, I've spoken to Al Lipkin. He wants to meet as soon as possible. You guys know my note from yesterday. That's what Mike said. The next thing is, I'm trying to --

MR. JOEY: Which note?

MR. ARMSTRONG: The two notes there. One has a bunch of questions. These are my -- what is it you call it? -- a shopping list.

MR. JOEY: Right. Your questions are on the back.

MR. ARMSTRONG: My questions are at the back, yeah.

MR. JOEY: How much pay to Ingram? By whom? What corps and individuals? When each payment made? How much for all other PIs prior to DM takeover? And following the specifications on this stuff.

MR. ARMSTRONG: Right.

MR. JOEY: You know, once again, this is in attorney's offices and -- maybe they can find out how much is paid to the attorneys.

MR. ARMSTRONG: That's how -- that's how I analyze it. The money flow is traceable. If they tell me -- if they can say this much is -- I tell you what, you should find out all payments made that went to attorneys, because I have people who can trace those bank accounts and see where the disbursements went from those accounts. You following me? And whether or not there is the

Just so that you know, shit, we have this group covered. And then divide it up structurally so that you have all the various key points which have to be covered. I think that you guys will be able to take over and then use operating income to continue the battle. And that way you can secure the buildings, take it over, and I think that it's going to take that kind of thing, a lot of people, by the way.

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MR. ARMSTRONG: Sooner or later someone's going to have to settle.

MR. JOEY: Yeah.

MR. ARMSTRONG: Like if you guys decide, "Fuck you," just continue on. It really doesn't make any difference. I have my lawsuit and I'm going ahead on that. And that keeps me involved, you know, in addition to everything else I do, and that's going to pay off sooner or later and I'm going to assist wherever I can in bringing this goddamned dog to bay, because I think it's -- there's no fucking way you guys should have to go through searches when you walk in and out of the

SECTION 7

GERRY ARMSTRONG VIDEO TRANSCRIPT

FOR 30 NOVEMBER 1984

(Entered as evidence into the
Christopherson Case on April 1985.)

MR. WADE: We'll go to the November 30th tape now, Exhibit 898.

(Following is video tape of November 30th played to the jury.)

- - - - -

MR. RINDER: How are you doing? I don't have much time either.

MR. ARMSTRONG: That's okay. Shoot. How are things going?

MR. RINDER: Pretty good. I have some questions to take back to the guys because we are, like, wanting to roll now.

MR. RINDER: Good. In moving on, the first thing I want to ask you, did you tell Samuels and (inaudible) about us?

MR. ARMSTRONG: No.

MR. RINDER: You didn't say anything to them about us? You mentioned to me last time you talked to him. We are concerned this is being -- you know, too many people.

MR. ARMSTRONG: I don't think there's of (inaudible) right now. (Inaudible) called me and said he heard that -- that I might know something about a takeover. And I said, "I know absolutely nothing." I said, "However, I think it behooves each of us on the outside to realize that there has to be a transition of some things, and that sooner or later there's going to be a shift and we all should be thinking how indeed that should be happening and what it should be like afterwards, and that each one of us should be creating that." So I said, "I have no specific knowledge, I have none whatsoever. However, something has to happen."

So I let them know that, yeah, they can always talk to me, and that -- (inaudible) particular positions outside the organization, obviously every I time talk to those guys, you know, there's an exchange of information. But they know nothing that I could be doing about you guys. They contacted me -- (inaudible). Not by me but -- you know, you guys can't keep the lid on very much longer.

MR. RINDER: (Inaudible.)

MR. ARMSTRONG: Her own sister told at least three maybe four, maybe more people.

MR. RINDER: Right.

MR. ARMSTRONG: Okay?

MR. RINDER: We know about that.

MR. ARMSTRONG: I don't know. It's obvious that -- that's the only leak that I know of, of any significance.

MR. RINDER: (Inaudible.)

MR. ARMSTRONG: (Inaudible) -- Joey contacted me to get information, and I said, "Listen, (inaudible) -- You know, I'm glad you contacted me because I consider you guys part of the network. And frankly, you both ought to be thinking, you know, status quo can't exist. What are we going to do? Everyone that I talked to led us along that direction. But as far as names, no one ever at any time will ever get a name out of me.

MR. RINDER: Right. Exactly.

MR. ARMSTRONG: You know, probably a lot of people know. Probably -- I would say that the Scientology world is so bored, and they're so (inaudible) and frightened of this (inaudible) shit anyway -- you know --

MR. RINDER: Yeah. But we just want to make sure that you are not passing around to anybody unnecessarily or doing anything that would damage our security.

MR. ARMSTRONG: In each case like Dave Jordan. Dave Jordan (inaudible) and that's fine. Dave Jordan heard a rumor that Dan might be a revelation to the organization.

MR. RINDER: Like, this is a little different from circumstances. Like if we allege that -- right? -- then we are not on the same position like where you were when you had a whole trial. You were like -- you know -- (inaudible) The position that you were in was -- you know, the Church is not believable to anybody. It's like, you know, it's got a bad reputation. That puts you in a position where the burden of truth (inaudible). We are not in that position because we are the Church.

MR. ARMSTRONG: You are the Church, but you guys are dedicated to the cleaning up of the Church (inaudible) guys who have control, should not have control. You are the Church and you should have control. And they abused (inaudible) -- illegally, because -- because simply, they should not do that. It all has to do with a crumby piece of money. Nobody gives a fuck about (inaudible) or whether or not the money is being used correctly, and whether or not the people who are, in fact, in control are doing it legitimately.

MR. RINDER: Yeah, but see, the thing is, what our advice is, is that in order to make the injunction -- a hearing for preliminary injunction stick, there's got to be some, like, criminal stuff.

That we gotta be (inaudible) --

MR. ARMSTRONG: How do you propose to render that? I can't. I told you what I can do.

MR. RINDER: What I was really asking you is -- Someone obviously put this together, whoever that may be. Someone put it together and it would appear that someone had data. We aren't able to find that data. We have found stuff that shows that, you know, what the Church has, but they're not true. Do you have something? Do you have something that we don't have that we could use to support those things?

MR. ARMSTRONG: Well, I told you, you could use Schomer. You could use the fact -- You could use the fact of anyone that you know of being locked up. It's illegal.

MR. RINDER: (Inaudible) That's the problem.

MR. ARMSTRONG: I was locked up.

MR. RINDER: Have you got an affidavit on that?

MR. ARMSTRONG: I have got a fucking ton of affidavits. I don't know where your guys' access is in the organization. I don't know.

MR. RINDER: Well, we can get a lot of shit. We've been working on this for, like, a couple of (inaudible) patently on its face illegal.

MR. RINDER: We are talking about -- Illegal? It isn't illegal. We have already checked that. It's not illegal to do that. That's the complaint that we are bringing. That's not a criminal matter. It's not -- That's not a crime.

MR. ARMSTRONG: Let's put it this way. There could be people going to jail over it.

MR. RINDER: I know that --

MR. ARMSTRONG: It's a civil lawsuit.

MR. RINDER: Yeah. But that's what -- It's a civil lawsuit, that's true.

MR. ARMSTRONG: Well, all you have to allege is that, number one, (inaudible) how much was spent by the organization at the orders of these people.

MR. RINDER: It's alleging things -- It alleges things.

MR. ARMSTRONG: That's fine.

MR. RINDER: That's going to take the whole trial, just like -- You know, I'm talking about the concern of a preliminary injunction. Alleging things is fine and alleging things we (inaudible) in certain cases is --

MR. ARMSTRONG: If you did, have them act immediately. That's all you have to do.

MR. RINDER: What is?

MR. ARMSTRONG: Is to say it. That's all that needs to be said.

MR. RINDER: We have a hearing and then we have a hearing for the preliminary injunction, that's like --

MR. ARMSTRONG: You have a lot of things going for you. If you follow on the tail of all these people being indicted at the top of the organization and the fact that all -

MR. RINDER: Yeah, but wait a minute. What's going to happen?

MR. ARMSTRONG: Hold on, hold on. Listen, we either are going ahead or we are not. Okay? I don't quite know what you are asking me, because I don't have the information on those three things.

MR. RINDER: Okay. That's what I was asking you, if you had something else you could get for us on those that would give us a stronger position.

MR. ARMSTRONG: That's what I'm telling you. If I were to get the affidavits on the outside from Schomer and from -- and from Nelson -- I don't know if Nelson will even talk to me, but I'll give it a try. And beyond that, I want to talk to the attorney. There is no one around, aside from guys are concerned. Right? You get a new recruit into the fold. It's a PR campaign.

MR. JOEY: Like these issues and PR campaign are going to disrupt the Church and turn it into management.

MR. ARMSTRONG: Well, those things, I leave that up -- obviously you guys are in a better position. Christ, you know the game far better than I do. If you want to agent provocateurs, you're the artists. You can probably "do what thou wilt" along those lines. I don't think I have to give you any instructions, but I do think that you know we sit at a particular crossroads of history relative to the Organization and, damn it, we should be able to act, I think. You know? And cause our own destiny here, instead of sitting back and waiting for it to happen. The adrenalin rush. But actually, I can do without that shit. Hence, I'm involved. I keep hearing those things all around, man --

MR. JOEY: All right. All right.

MR. ARMSTRONG: You know I'll probably have more questions. I always have a lot of questions later. Oh, the other thing, I don't know if it makes sense to you to sort of divide up the Organization and go after people on that basis.

FALSE REPORT CORRECTION

GERALD ARMSTRONG

DEFENDANT'S EXHIBIT
3D
7/27/94
FARNY

GERALD ARMSTRONG

Armstrong is a former clerk for the Church of Scientology of California who, as part of his duties, was entrusted with the care of thousands of pages of personal records belonging to L. Ron Hubbard. In December 1981, Armstrong left the Church and took with him more than 10,000 pages of records belonging to Mr. Hubbard and the Church. This included 5,000 pages of original documents for which no copy was left behind.

As the custodian of confidential Church papers, Armstrong had a fiduciary responsibility not to disclose these documents to individuals outside the Church. In breach of this obligation, Armstrong loaned the documents to one Omar Garrison, an author who at one time had been retained to write a biography of Mr. Hubbard, a project which fell through. Armstrong gave these documents to Garrison not to assist him in writing the biography but to enable Garrison to deliver them to attorneys representing litigants involved in suits against the Church.

In April 1982, Armstrong also made contact with Michael J. Flynn, who was the lead attorney in more than a dozen lawsuits against the Church. Armstrong showed Flynn two private archival documents. Thereafter, from May until August 1982, Armstrong continued to give stolen documents to Flynn for use in Flynn's cases against the Church, even though the litigation did not involve Armstrong. Ultimately, Armstrong gave Flynn thousands of documents, including original and private Navy records and diaries of Mr. Hubbard from the 1940s.

On May 26 and May 27, 1982, the Church wrote to Armstrong demanding return of all the stolen documents, but Armstrong denied having them. Subsequently, however, Armstrong admitted that he indeed had possessed the stolen documents on those dates.

The Church sued Armstrong for the return of the documents. Trial began in the California Superior Court in May 1984. The Court received the testimony of Armstrong and his witnesses, many of whom were clients of attorney Flynn in other actions against the Church. These witnesses for Armstrong were permitted to testify as to Armstrong's purportedly imperiled state of mind. The Court did not permit the Church to present any of its own witnesses to rebut the testimony of hostile witnesses about Armstrong's alleged "state of mind."

Judge Paul G. Breckenridge also heard "evidence" from Armstrong consisting of distortions, half-truths, and outright falsehoods, amounting to a justification defense that Armstrong had stolen the documents to protect himself in the event of "retaliation" by the Church. The result was a negative decision for the Church.

Since the case was heard, Armstrong has adopted a degraded life-style and developed some odd financial ideas. He is the self-proclaimed founder of the "Organization of United Renunciants." In November 1992, the Marin Independent Journal attempted to explain Armstrong's philosophy of life in an article entitled "Is money the root of problems?" The story featured a photograph of an apparently naked Armstrong, eyes closed and smiling, sitting in a lotus position embracing an enormous globe.

According to the article, "Gerald Armstrong has an idea for dealing with the national debt -- write it off. Forget it. It doesn't exist."

"It's that easy.

"The novel prescription for fixing the fiscal fiasco is only part of Armstrong's larger message that money should be abolished ... Armstrong can count only a handful of friends as converts, but he is trying to get the word out. Detailed proposals have gone out to Bill Clinton, Ross Perot and Pete Wilson (no one has tapped him for an economic advisory post just yet). He has also written to the New York Times and other mega-media.

"Ted Koppel has not called."

Armstrong's ideas include "no more pay checks, no more loan payments, no more taxes, and forget that $20 you owed your brother-in-law." **SECTION 1**

Today, Armstrong is hooked up with Cult Awareness Network, which is primarily a referral agency for those who engage in the illegal activity of kidnapping adults for the purpose of forcibly persuading them to abandon their religious beliefs. In November 1992, Armstrong attended CAN's convention in Los Angeles. He has the ear of Priscilla Coates and appears to be on excellent terms with CAN's leadership.

Armstrong Plotted to Take Over Church Assets

Since the trial, the Church has discovered new evidence which was completely unavailable in 1984.

This evidence shows conclusively that Armstrong's "justification" defense was a sham and a fraud. He was not remotely in fear of retaliation by the Church and was actively plotting the Church's downfall.

Armstrong considered the materials he had stolen useful not only as a lever against the Church and Mr. Hubbard in ongoing litigation with Flynn's clients, but he also sought to use the materials in pursuit of his plan to undermine the Church for his own financial benefit.

As part of his plan, Armstrong actively sought out Church staff members who would be willing to "defect" and assist him in discrediting Church leadership. After leaving the Church, he contacted Church member Daniel Sherman to enlist Sherman's aid in attacking the Church. Sherman, without Armstrong's knowledge, consulted Church staff for advice. It was decided that the Church would obtain authorization from the Los Angeles Police Department to make "undercover" videotapes of Armstrong's conversations with Sherman and any other Church dissidents or defectors.

The police authorized the investigation and videotapes, at which point Sherman embarked on an effort to ascertain the full extent of Armstrong's intentions.

Sherman informed Armstrong that a group of staff members who were dissatisfied with Church management might be interested in working with him in his efforts to undermine the Church. This wholly fictitious group was dubbed "the Loyalists."

Sherman enlisted the aid of two other persons, David Kluge and Mike Rinder, who agreed to pose as "Loyalists" and meet with Armstrong. Kluge assumed the code name "Joey," and first met with Armstrong in the late summer of 1984.

Armstrong told "Joey" that part of his plan was to use the auspices of the Internal Revenue Service to attack the Church. Armstrong wanted "Joey" to plant in the Church's files the documents Armstrong would fabricate, so that Armstrong could tell the Criminal Investigation Division (CID) of the Los Angeles IRS office to conduct a raid and find the "incriminating" documents. He reassured "Joey" that he would be able to create the needed documents "with relative ease" since he had done "it for a living."

Armstrong also explained to "Joey" how he intended to go about forging the new documents, based on his experience:

ARMSTRONG: "So it seems to me that the use of the communication lines, I don't know maybe you guys are using them, but it seems to me that you don't have a way of printing anything to get an issue on the lines, used for anything. Right? I'm saying that I can do it. I can type those goddam things and duplicate them and make them look exactly the same. You can't, you would not be able to tell the difference."

Armstrong also made it clear that he had developed a personal program intended to undermine and eventually destroy the Church. His goals were to oust the current management of Scientology, to obtain an advisory position within the restructured Church by becoming a consultant to the "Loyalists" and to plunder the Church for his own financial gain. His program to remove current Church management included the filing of a civil suit, based on evidence that he would manufacture. In a conversation with another co-conspirator, who, unknown to Armstrong, was still faithful to the Church, he insisted that the suit could be launched based on manufactured allegations.

ARMSTRONG: "They can allege it! They can allege it! They don't even have - they can allege it!"

MIKE: "So, they don't have to -- like, they don't have to have the document sitting in front of them, and then. ..."

ARMSTRONG: "I'm f-king saying the organization destroys the documents. ...!"

MIKE: "The point -- the point I'm trying to get across is that that's not criminal. That's the -- that's the civil complaint in there and that would have to be proven."

ARMSTRONG: "Show me the lines you're talking about."

MIKE: "Well, it's over here."

ARMSTRONG: "Where are the -- we don't have to prove a goddam thing. We don't have to prove sh-t. We just have to allege it. **SECTION 2**

At other meetings between Armstrong and his "co-conspirators," Armstrong described in detail his plans for bringing about the collapse of the Church so that he and the other "Loyalists" could move in and take over. Armstrong's goal, as revealed in his own words on videotape, was to overthrow existing Church management and to set up in its place a new set of Church executives who would settle all of the civil damages suits brought against the Church by the attorneys representing Armstrong. His plans included wresting control of the Church, planting forged incriminating documents in Church files, to be discovered by a government raid, and blackmailing a senior Scientologist executive through attempted sexual entrapment. **SECTION 3**

In sum, Armstrong's plans consisted of:

A) Stealing documents from the Church to serve as models for forgeries. **SECTION 4**

B) Plotting the forgery of false incriminating evidence in Church files. **SECTION 5**

C) Orchestrating a coup in which agents of Armstrong and the U.S. government would take control of the Church of Scientology from its lawful management; **SECTION 6**

D) Suborning perjury in order to keep his conspiracy under cover. **SECTION 7**

Armstrong also worked closely with Michael Flynn and two members of the IRS CID, Al Lipkin and Al Ristuccia. In late summer or early fall of 1984, Armstrong contacted Sherman and explained that he and his IRS contacts had come up with a plan to create false documents and plant these on Church premises, where they would be seized in a CID raid. According to Armstrong the IRS agents wanted the "Loyalists" to plant covert electronic bugs in Church offices. Armstrong offered eavesdropping and special photographic equipment.

Armstrong informed "Joey" that the "Loyalists" would be placed in the federal witness protection program and would receive tax-exempt status in exchange for participating in the covert operation.

Armstrong instructed "Joey" how to lie under oath about their plans to disrupt Church management. Armstrong wanted "Joey," if deposed, to say that he and Armstrong had merely discussed a "global settlement" of Church litigation.

ARMSTRONG: "OK, what are our conversations, should it come down to it?"

"JOEY": "What do you mean?"

ARMSTRONG: "What do we talk about? You're deposed. You walk out there, and there's a PI hands you a paper, saying you're deposed, Jack, and not only that, you're out of the organization. And what do you say in deposition. Well, Armstrong and I talked about this, and he had a whole bunch of ideas about how to infiltrate the communication lines and spread turmoil and disaster, you know. What are we doing here? That's my question, before I tell you my ideas on documents."

"JOEY": "Well, what I got is basically -- Loyalists gotta -- we gotta move -- we've got the suit coming up and I guess we need other lines to get stuff going. ..."

ARMSTRONG: "OK. So as far as the doc ... Let me just say, ah, you and I get together, we get together because we have a goal of global settlement. You have felt that the turmoil and abuses and so on have gone on too long ... Hence we get together and discuss things. We have not discussed anything about a destruction of the tech, or Scientology is bad, or anything like that. Are we agreed?" **SECTION 8**

During one meeting with "Joey," Armstrong's alleged claim that he "feared" Church retaliation was revealed as a complete falsehood.

"JOEY": "Well you're not hiding!"

ARMSTRONG: "Huh?"

"JOEY": "You're not hiding."

ARMSTRONG: "F-k no! And ..."

"JOEY": "You're not afraid, are you?"

ARMSTRONG: "No! And that's why I'm in a f-king stronger position than they are!"

"JOEY": "How's that?"

ARMSTRONG: "Why, I'll bring them to their knees!"

New evidence of Armstrong's fraudulent intentions was revealed in a declaration of November 18, 1991, in which he admitted that he never intended to stick to the terms of the settlement agreement he signed with the Church in 1986. In his declaration, Armstrong asserted that he had read and understood the settlement agreement, but that he "put on a happy face" and went through the charade of signing it even though he told his lawyers that he never intended to abide by its terms. Armstrong's stated reason for signing the agreement in the full knowledge that he would violate it later is so that he could receive the "financial wherewithal" to "get on with the next phase of [his] life." **SECTION 9**

Armstrong's motives were money and power. This is also shown by a letter to Church attorney Eric Lieberman on June 21, 1991. Armstrong wrote that he had been asked to testify against the Church in a case in South Africa. He laid out specific terms for the settlement of that case. **SECTION 10**

The Church later appealed the Breckenridge judgment and a decision was issued by the Court of Appeal in 1991. The Church had sought to introduce evidence showing Armstrong's attempts to organize a conspiracy to bring it down, but the Appeals Court stated that it could not accept the new evidence because it had not been a part of the trial record. The Court's decision upheld that of the lower court, but stated that Breckenridge's negative comments about the Church were to be taken to indicate Armstrong's state of mind at the time he stole the documents, and not for their truth.

Armstrong's state of mind is illustrated by various "literary" writings authored by him, none of which more clearly demonstrated it than a document now known as the "pig letter," in which Armstrong purported to describe a dream. **SECTION 11**

All the documents Armstrong stole have now been returned to the Church. As mentioned above, Armstrong never intended to abide by the terms of the agreement, which included staying out of other court cases involving the Church. Armstrong meddled in these and tried to prejudice their outcome. So, in 1992, the Church filed a new suit against him for breach of settlement. The Court entered an injunction preventing Armstrong from violating the settlement agreement by assisting anti-Church litigants. **SECTION 12**

During the trial in 1984, Armstrong had made numerous false allegations about L. Ron Hubbard, pretending to the judge that while in the Church, he had thoroughly researched Mr. Hubbard's life. However, Armstrong's incompetence as a researcher is well documented. Ironically, it was Armstrong's lack of research into the various facts and incidents regarding Mr. Hubbard's life that led him to his false claims.

In the court transcripts, Armstrong admitted to his own incompetence as a researcher. While being cross-examined concerning his "research" regarding L. Ron Hubbard's career as an officer in the Navy during World War II, Armstrong stated the following about himself:

1. He was never trained in how to research a

biography.

2. He never searched out and obtained official documents from any agency of the United States government.

3. He was not aware that there was an agency of the United States Navy that kept records of ships.

4. He never attempted to find out what data the Naval Historical Center had on the subchaser 815, the ship under the command of L. Ron Hubbard during World War II.

5. Armstrong concluded that Hubbard was not a Commander of a squadron of Corvettes as he did not do the necessary research to locate the documents in Navy files which established that Hubbard was in command of a squadron of Corvettes (English term for subchaser). Armstrong was not even aware that the initials SC stood for Submarine Chaser.

When questioned during the trial on evidence substantiating Mr. Hubbard's combat record, Armstrong admitted that he merely "went through some books on the subject. But that was it. I never went to D.C. And I obviously never checked the sources that whoever did this research was able to check. So I stand corrected."

SECTION 13

Armstrong also challenged Mr. Hubbard's claim that he (Mr. Hubbard) had been made a blood brother of the Blackfeet Indian tribe. Yet just recently that nation celebrated Mr. Hubbard's 70th anniversary as a blood brother.

A reliable account of Mr. Hubbard's career in the Navy is given by L. Fletcher Prouty, former senior U.S. intelligence officer with the Pentagon.

Mr. Prouty, who joined the Army just a month before Mr. Hubbard joined the Navy, is experienced in reading and understanding military and intelligence records. There is an intelligence process called "sheep dipping," wherein additional or cover files are created which mask the true activities of the intelligence operative. Mr. Prouty's knowledge is based on firsthand experience in creating such files.

His analysis of Mr. Hubbard's files shows that there are at least two and more likely three separate and different files in existence: a "false" file created by the Navy; a personnel file; and a file which contains Mr. Hubbard's true activities as an intelligence officer. It is this last file which appears missing and therefore there is an incomplete record of Mr. Hubbard's career.

Detailed examples are provided in Mr. Prouty's affidavit. **SECTION 14**

Regarding Mr. Hubbard's medical history, Mr. Prouty points out that Mr. Hubbard's Notice of Separation paper indicates he was awarded the Purple Heart twice. The Purple Heart is awarded only to those wounded in action.

Another document from the U.S. Naval Hospital in Oakland covers Mr. Hubbard's condition following the war:

"Eyesight very poor. ... Lame in right hip from service connected injury. Infection in bone. ... All service connected."

In sum, Mr. Hubbard's past is exactly what he stated it is.

Mr. Hubbard's achievements completely belie Armstrong's allegations. Through hundreds of books and literally thousands of articles and lectures, L. Ron Hubbard communicated and taught the methods which today are used by millions to improve their own lives and the lives of those around them. His career spans more than 50 years during which he produced more than 530 published works which have sold more than 100 million copies in more than two dozen languages. In developing the religious philosophy of Scientology, he delivered and recorded 6,000 lectures. In country after country, he has received wide acclaim for his accomplishments in bettering mankind.

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FALSE REPORT CORRECTION

GERALD ARMSTRONG

DEFENDANT'S EXHIBIT
3D
7/27/94
FARNY

EXHIBIT
29
7/29/94 Fraley

August 4, 1991

GERALD ARMSTRONG

Gerry Armstrong is a former archivist for the Church of Scientology of California who, as part of his duties, was entrusted with the care of thousands of pages of personal records belonging to L. Ron Hubbard. In December 1981, Armstrong left the Church, and took with him over 10,000 pages of records belonging to Mr. Hubbard, Mrs. Hubbard and the Church, including over 5,000 pages of original documents for which no copy was left behind. Armstrong then turned those documents over to attorneys representing plaintiffs suing the Church and the Hubbards in spurious civil damages actions. The Church and Mrs. Hubbard filed suit in August 1982 to obtain the return of the stolen documents, and Armstrong was required to surrender all copies of the stolen records to the Los Angeles Superior Court for safekeeping while the action was litigated. In June 1984, following a six week trial in which the Court allowed Armstrong to enter several thousand pages of the stolen documents into evidence as support for his "state of mind," the Court ruled that the Church and Mrs. Hubbard had proven their cases against Armstrong for civil theft of the documents, for breach of his fiduciary duties, and for invasion of Mrs. Hubbard's privacy. However, in a decision which is still on appeal, the Court also ruled that Armstrong was justified in his actions by his fear of potential harm from the Church.

In August 1984, Armstrong began conspiring with staff members of the Church whom he believed to be disaffected with Church management. Armstrong's goal was to overthrow existing Church management and to set up in its place a new set of Church executives who would settle all of the civil damages suits brought against the Church by the attorneys representing Armstrong. Armstrong's actions were directed by attorney Michael J. Flynn as well as Los Angeles Internal Revenue Service Criminal Investigations Division special agent Alan Lipkin. His plans included planting forged incriminating documents in Church files, to be discovered by a government raid, and blackmailing a senior Scientologist executive through attempted sexual entrapment. Armstrong's plans also included the filing of a civil damages suit against Church management and, when the Church staff member with whom he was plotting stated that they did not have the evidence needed for such a suit, Armstrong told the staff member to, "just allege it." However, unknown to Armstrong, the staff members with whom he was conspiring were not actually opposed to Church management, and much of his plotting was videotaped. (See Declarations of John G. Peterson **page 4** and Earle C. Cooley **page 12**.

In March and April 1985, Armstrong testified at the trial of the civil action brought against the Church of

Scientology in Portland, Oregon by Julie Christofferson. During that trial, the videotapes of Armstrong's abortive conspiracy were made public. Also obtained from Armstrong's fellow "conspirators" during that period of time were copies of various "literary" writings authored by Armstrong, none of which more clearly demonstrated his state of mind than a document now known as the "pig letter," in which Armstrong purported to describe a dream. (See letter, **page 31.**)

In December 1986, the Church entered into a settlement agreement with Armstrong's attorneys in which all of the cases brought by those attorneys, including Armstrong's cross-complaint against the Church of Scientology of California and Mrs. Hubbard, were settled. (The sole exception to this was the suit brought against Armstrong, which remained pending on appeal.) One of the conditions of that settlement was that Armstrong and his counsel surrender all of the documents in their possession pertaining to the Church or the Hubbards. When they did so, copies of the documents which Armstrong had stolen from the Church in December 1981 were provided, demonstrating that Armstrong had perjured himself numerous times throughout the history of the litigation when he had asserted that all such copies were surrendered to the court. (See Declaration of Kenneth D. Long, **page 33.**)

ALLEGATION:

Church management is corrupt, and commits actions such as blackmail and extortion through the use of confidential pastoral counseling information.

TRUE INFORMATION:

Armstrong admitted as part of the December 1986 settlement of his case that the actions of the Church from which his disagreements stemmed had all been committed by the Guardian's Office, a branch of the Church which was completely cleaned up by present Church management. (See Declaration of Gerald Armstrong, **page 36.**)

ALLEGATION:

L. Ron Hubbard lied about his background and history, including his record in World War II.

TRUE INFORMATION:

Armstrong had no formal training on biographical research, and never attempted obtain any such training. He did not go to government agencies or the Naval Historical Center for records regarding Mr. Hubbard or the ships on which Mr. Hubbard served in WW II. As a result, he had to testify "I stand corrected" when shown evidence from such sources regarding Mr. Hubbard's command of a squadron of corvettes during WW II - **page** 38.)

Mr. Hubbard's record, because of his assignment to Naval Intelligence, has been "sheep dipped," meaning that multiple copies of his service record have been created, many of which are false, in order to facilitate his duties. (See Declaration of L. Fletcher Prouty, **page** 48.)

For Further Information Contact:

Earle C. Cooley, Esq. (617) 542-3700

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FALSE REPORT CORRECTION

BRECKENRIDGE

DEFENDANT'S
EXHIBIT
25
7/27/94 Farny

7613

CHURCH OF SCIENTOLOGY OF CALIFORNIA (Plaintiff)

VS

GERALD ARMSTRONG (Defendant)

June 20, 1984

Gerry Armstrong is a former clerk for the Church of Scientology of California who, as part of his duties, was entrusted with the care of thousands of pages of personal records belonging to L. Ron Hubbard. In December 1981, Armstrong left the Church, and took with him over 10,000 pages of records belonging to Mr. Hubbard, Mrs. Hubbard and the Church. This included 5,000 pages of original documents for which no copy was left behind.

In August 1982, the Church filed suit against Armstrong for return of these documents. Judge Paul Breckenridge, who presided over the case in the California Superior Court, admitted that in taking the documents, Armstrong "may have engaged in overkill, in the sense that he took voluminous materials, some of which appear only marginally relevant to his defense." Armstrong pleaded "justification," claiming that his theft of the materials was necessary as insurance against suits or attacks against him by the Church.

Apart from his comments on Armstrong's "overkill," Breckenridge's findings were highly negative about the Church and Mr. Hubbard, showing the extent to which false reports aired in the courtroom by Armstrong had impinged on him.

Since the case was heard, Armstrong has adopted a hippy life-style. He is the self-proclaimed founder of the "Organization of United Renunciants." A November 1992 article in the Marin Independent Journal featured a photograph of an apparently naked Armstrong, eyes closed and smiling, sitting in a lotus position embracing a globe.

The article stated that "Gerald Armstrong has an idea for dealing with the national debt — write it off. Forget it. It doesn't exist."

"It's that easy.

"The novel prescription for fixing the fiscal fiasco is only part of Armstrong's larger message that money should be abolished. ... Armstrong can count only a handful of friends as converts, but he is trying to get the word out. Detailed proposals have gone out to Bill Clinton, Ross Perot and Pete Wilson (no one has tapped him for an economic advisory post just yet). He has also written to the New York Times and other mega-media.

"Ted Koppel has not called."

Section 1

7614

FALSEHOOD IN FINDINGS BY JUDGE BRECKENRIDGE:

"The Church or its minions is fully capable of intimidation or other physical or psychological abuse if it suits their ends. The record is replete with evidence of such abuse."

TRUE INFORMATION

Incontrovertible evidence, not available at the time of the trial and not permitted to be included in the appeal record, has established that Armstrong's justification defense was a fraud upon the court, designed to avoid liability for his tortious conduct and to prevent fair adjudication of the Church's claims.

As the custodian of confidential Church papers, Armstrong had a fiduciary responsibility not to disclose these documents to individuals outside the Church. In breach of this obligation, Armstrong loaned the documents to one Omar Garrison, an author who at one time had been retained to write a biography of Mr. Hubbard, a project which fell through. Armstrong gave these documents to Garrison not to assist him in writing the biography but to enable Garrison to deliver them to attorneys representing litigants involved in suits against the Church.

In April 1982, Armstrong also made contact with Michael J. Flynn, who was the lead attorney in more than a dozen lawsuits against the Church. Armstrong showed Flynn two of the most intensely private archival documents. Thereafter, from May until August 1982, Armstrong continued to give stolen documents to Flynn for use in Flynn's cases against the Church, even though the litigation did not involve Armstrong. Ultimately, Armstrong gave Flynn thousands of documents, including original and private naval records and diaries of Mr. Hubbard from the 1940s.

On May 26 and May 27, 1982, the Church wrote to Armstrong demanding return of all the stolen documents, but Armstrong denied having them. Subsequently, Armstrong admitted that he indeed had possessed the stolen documents on those dates.

Trial began in May 1984. The Court received the testimony of Armstrong and his witnesses, many of whom were clients of attorney Flynn in other actions against the Church. These witnesses for Armstrong were permitted to testify as to Armstrong's purportedly imperiled state of mind. The Court did not permit the Church to present any of its own witnesses to rebut the testimony of hostile witnesses about Armstrong's alleged "state of mind."

Breckenridge also heard "evidence" from Armstrong consisting of distortions, half-truths, and outright falsehoods, amounting to a justification defense that Armstrong had stolen the documents to protect himself in the event of "retaliation" by the Church.

Since the trial, the Church has discovered new evidence which was completely unavailable at the time of trial. This evidence shows conclusively that Armstrong's "justification" defense was a sham and a fraud. He was not remotely in fear of retaliation by the Church and was actively plotting the Church's downfall.

Armstrong considered the stolen materials useful not only as a lever against the Church and the Hubbards in then- ongoing litigation with Flynn's clients, but he also sought to use the materials in pursuit of his plan to undermine the Church for his own financial benefit.

As part of his plan, Armstrong actively sought out Church staff members who would be willing to "defect" and assist him in discrediting Church leadership. After leaving the Church, he contacted Church member Daniel Sherman to enlist Sherman's aid in attacking the Church. Sherman, without Armstrong's knowledge, consulted Church staff for advice. It was decided that the Church would obtain authorization from the Los Angeles Police Department to make "undercover" videotapes of Armstrong's conversations with Sherman and any other Church dissidents or defectors.

The police authorized the investigation and videotapes, at which point Sherman embarked on an effort to ascertain the full extent of Armstrong's intentions.

Sherman informed Armstrong that a group of staff members who were dissatisfied with Church management might be interested in working with him in his efforts to undermine the Church. This wholly fictitious group was dubbed "the Loyalists."

Sherman enlisted the aid of two other persons, David Kluge and Mike Rinder, who agreed to pose as "Loyalists" and meet with Armstrong. Kluge assumed the code name "Joey," and first met with Armstrong in the late summer of 1984.

Armstrong told "Joey" that part of his plan was to use the auspices of the Internal Revenue Service to attack the Church. Armstrong wanted "Joey" to plant in the Church's files the documents Armstrong would fabricate, so that Armstrong could tell the Criminal Investigation Division (CID) of the Los Angeles IRS office to conduct a raid and find the "incriminating" documents. He reassured "Joey" that he would be able to create the needed documents "with relative ease" since he had done "it for a living."

Armstrong also explained to "Joey" how he intended to go about forging the new documents, based on his experience: ARMSTRONG: "So it seems to me that the use of the communication lines, I don't know maybe you guys are using them, but it seems to me that you don't have a way of printing anything to get an issue on the lines, used for anything. Right? I'm saying that I can do it. I can type those goddam things and duplicate them and make them look exactly the same. You can't, you would not be able to tell the difference."

Armstrong also made it clear that he had developed a personal program intended to undermine and eventually destroy the Church. His goals were to oust the current management of Scientology, to obtain an advisory position within the restructured Church by becoming a consultant to the "Loyalists" and to plunder the Church for his own financial gain. His program to remove current Church management included the filing of a civil suit, based on evidence that he would manufacture. In a conversation with another co-conspirator, who, unknown to Armstrong, was still faithful to the Church, he insisted that the suit could be launched based on manufactured allegations. ARMSTRONG: "They can allege it! They can allege it! They don't even have - they can allege it!" MIKE: "So, they don't have to -- like, they don't have to have the document sitting in front of them, and then...." ARMSTRONG: "I'm f-king saying the organization destroys the documents...!" MIKE: "The point -- the point I'm trying to get across is that that's not criminal. That's the -- that's the civil complaint in there and that would have to be proven." ARMSTRONG: "Show me the lines you're talking about." MIKE: "Well, it's over here." ARMSTRONG: "Where are the -- we don't have to prove a goddam thing. We don't have to prove sh-t. We just have to allege it. **Section 2**

At other meetings between Armstrong and his "co-conspirators," Armstrong described in detail his plans for bringing about the collapse of the Church so that he and the other "Loyalists" could move in and take over. Armstrong's goal, as revealed in his own words on videotape, was to overthrow existing Church management and to set up in its place a new set of Church executives who would settle all of the civil damages suits brought against the Church by the attorneys representing Armstrong. His plans included planting forged incriminating documents in Church files, to be discovered by a government raid, and blackmailing a senior Scientologist executive through attempted sexual entrapment. **Section 3**

In sum, Armstrong's plans consisted of:

A) Stealing documents from the Church to serve as models for forgeries. **Section 4**

B) Plotting the forgery of false incriminating evidence in Church files. **Section 5**

C) Orchestrating a coup in which agents of Armstrong and the U.S. government would wrest control of the Church of Scientology from its lawful management; **Section 6**

D) Suborning perjury in order to keep his conspiracy under cover. **Section 7**

Armstrong also worked closely with Michael Flynn and two members of the IRS CID, Al Lipkin and Al Ristuccia. In late summer or early fall of 1984, Armstrong contacted Sherman and explained that he and his IRS contacts had come up with a plan to create false documents and plant these on Church premises, where they would be seized in a CID raid. According to Armstrong the IRS agents wanted the "Loyalists" to plant covert electronic bugs in Church offices. Armstrong offered eavesdropping and special photographic equipment.

Armstrong informed Joey that the "Loyalists" would be placed in the federal witness protection program and would receive tax-exempt status in exchange for participating in the covert operation.

Judge Breckenridge, who in his decision praised Armstrong for his "dedication" to the truth, would have been astonished had he witnessed Armstrong's discussions with "Joey." In one of them, available on tape, Armstrong instructed "Joey" how to lie under oath about their plans to disrupt Church management. Armstrong wanted "Joey," if deposed, to say that he and Armstrong had merely discussed a "global settlement" of Church litigation. ARMSTRONG: "OK, what are our conversations, should it come down to it?" JOEY: "What do you mean?" ARMSTRONG: "What do we talk about? You're deposed. You walk out there, and there's a PI hands you a paper, saying you're deposed Jack, and not only that, you're out of the organization. And what do you say in deposition. Well, Armstrong and I talked about this, and he had a whole bunch of ideas about how to infiltrate the communication lines and spread turmoil and disaster, you know. What are we doing here? That's my question, before I tell you my ideas on documents." JOEY: Well, what I got is basically -- Loyalists gotta -- we gotta move -- we've got the suit coming up and I guess we need other lines to get stuff going...." ARMSTRONG: "OK. So as far as the doc... Let me just say, ah, you and I get together, we get together because we have a goal of global settlement. You have felt that the turmoil and abuses and so on have gone on too long... Hence we get together and discuss things. We have not discussed anything about a destruction of the tech, or Scientology is bad, or anything like that. Are we agreed?"

Armstrong successfully used the fabricated defense of justification to pull the wool over Breckenridge's eyes and escape liability for his theft and breach of confidence. During one meeting with "Joey," Armstrong's alleged claim that he "feared" Church retaliation was revealed as a complete falsehood. JOEY: "Well you're not hiding!" ARMSTRONG: "Huh?" JOEY: "You're not hiding." ARMSTRONG: "F-k no! And...." JOEY: "You're not afraid, are you?" ARMSTRONG: "No! And that's why I'm in a f-king stronger position than they are!" JOEY: "How's that?" ARMSTRONG: "Why, I'll bring them to their knees!"

New evidence of Armstrong's fraudulent intentions was revealed in a declaration of November 18, 1991, in which he admitted that he never intended to stick to the terms of the settlement agreement he signed with the Church in 1986. In his declaration, Armstrong asserted that he had read and understood the settlement agreement, but that he "put on a happy face" and went through the charade of signing it even though he told his lawyers that he never intended to keep to its terms. Armstrong's stated reason for signing the agreement in the full knowledge that he would violate it later is so that he could receive the "financial wherewithal" to "get on with the next phase of [his] life." **Section 8**

Breckenridge's willingness to believe Armstrong is partly attributable to Armstrong's own skill as a con-man, and partly to Breckenridge's own history as a judge compounded with his misperception of the Church of Scientology.

Paul Breckenridge spent 15 years of his life, from 1953 to 1968, defending alleged criminals in the Los Angeles Public Defender's office. Breckenridge went into the L.A. Superior Court in 1968 and was assigned to criminal trials up until 1974. It was not until 1978 that Breckenridge moved to civil cases.

Breckenridge's history shows that he came under attack several times as a judge in the criminal court, including having suits filed against him for violation of civil rights. Breckenridge has been sued together with staff from the Los Angeles District Attorney's office, the California Attorney General's office and others in the field of law enforcement.

On December 8, 1971, a Ronald Fobbs filed suit against Breckenridge and several others including the L.A. District Attorney. The suit was filed over an incident whereby Fobbs spent two years in jail unnecessarily. Because Fobbs had never waived his right to a jury trial, when the decision in his case was reversed he sued Breckenridge and others involved in the case. He did not pursue it.

In July 1973, Breckenridge was sued together with L.A. District Attorney Joseph Busch and other law enforcement personnel, again on charges of violations of federal rights. The plaintiff was a John Aravjo, who asked for $20,000 compensatory damages plus $10,000 punitive damages from each plaintiff. Aravjo filed suit claiming harassment and deprivation of his right to a fair and speedy trial, but again, it was not followed through.

These cases indicate that Breckenridge was weak in cases involving civil rights or the defense of basic freedoms. Further, in regard to the Church of Scientology, Breckenridge's many years in the L.A. Court system meant he was familiar with court cases involving members of the former Guardian's Office of the Church. This office had been an autonomous organization charged with responsibility for public relations, investigative and legal matters. It was disbanded by Church management and no longer exists.

In his decision, Breckenridge referred to the Guardian's Office (GO) and showed that he had confused the GO with the Church of Scientology. He failed to realize that it is current Church management which abolished the GO and restructured the external-facing activities of the Church from scratch. By the time the Armstrong case went to trial, current management of the Church had already taken decisive steps to ensure that a repetition of the incidents that led to the imprisonment of eleven GO members would never occur again.

Ignorant of these facts, Breckenridge assumed that the Guardian's Office and the Church were one and the same. This misperception made him an easy target for Armstrong, who adopted the deliberate tactic of exploiting the judge's faulty perception of the Church.

In an interview that he gave to the Rocky Mountain News in February 1983, Mr. Hubbard made clear that the GO actions which led to indictments were totally against the policies of the Church. He said, "I learned about it [the case] like everyone else -- after the fact -- and could only shake my head in dismay... Whatever they did, if they did it, was in violation of any policy I ever wrote while Executive Director, years ago, and I think all those people have been removed, as I understand that there is an entirely new hierarchy in the Church."

In actual fact, Scientologists do charitable work, thousands are active in remedying drug abuse, crime and illiteracy and nearly all are active in some way to improve their community. These facts about the Church never came to Breckenridge's notice.

FALSEHOOD IN FINDINGS BY JUDGE BRECKENRIDGE:

[Scientology] under the pretext of 'freeing humans' is nothing in reality but a vast enterprise to extract the maximum amount of money from its adepts.

TRUE INFORMATION:

The Church of Scientology is not a money-making enterprise; it is, as numerous courts have affirmed, a religion. In country after country, courts have exhaustively examined the philosophy and practice of Scientology and upheld its religious bona fides.

A landmark recognition which upheld the religious nature of Scientology was issued from the United States Court of Appeals in 1969. The court ruled, "the Founding Church of Scientology has made out a prima facie case that it is a bona fide religion.... a prima facie case exists that auditing [counseling] is a practice of Scientology, and that accounts of auditing integrated into the general theory of Scientology are religious doctrines." **Section 9**

In affirming Scientology's status as a religion, the U.S. District Court for the District of Columbia stressed equal treatment for religions under the Constitution. In 1983, the court stated that "the Church of Scientology must be treated the same as any established religion or denominational sect within the United States, Catholic, Protestant or other."

In 1985, in the Superior Court of California, Judge Norman L. Epstein emphasised that the Church's religious nature was not open to question. "The supporting documents for the proposition that Scientology is a religion do more than make a prima facie case; they make a strong case," Epstein ruled.

Many of these recognitions are reproduced in a booklet published by the Church, entitled Winning! Victories of the Church of Scientology. **Section 10**

Since the mid-1970s 14 Scientology Churches have been recognized as Churches and as tax-exempt religious organizations by the Internal Revenue Service.

In countries outside the United States, Scientology has also achieved recognition as a religion from numerous courts, including the High Court of Australia. In 1983, five judges of the High Court found unanimously that "The conclusion that [Scientology] is a religious institution entitled to tax exemption is irresistible." **Section 11**

Again and again, Court findings have stressed that the income received by the Church is used for no other purpose than to further the religious aims of Scientology.

On 12 October 1988, the Administrative Court in Berlin ruled that there was no evidence that income received by the Church went to private individuals. The court found that, "Plaintiff [the Church] showed that the gained income is used for the religious and philosophical activities of the associations in Germany and also in other countries...." **Section 12**

On 30 January 1985, the District Court of Stuttgart, Germany had issued a clear-cut ruling which made the same point:

"The court has no indication that the assumption that books available for purchase, brochures or other study and information materials would not serve this religious purpose; the same is valid for the course seminars and auditing being subject to a contribution fee, all of which -- according to the self-understanding of the concerned and his church -- constitute direct religious actions and customs, and immediately serve a religious purpose or are directly religiously motivated." **Section 13**

On 19 September 1990, the District Court of Hanover repeated that funds collected by the Church were used solely to further the religious activities of Scientology.

In Italy, the Church has also been found qualified for tax-exemption on the basis of its being a religious not a commercial activity.

The following are some examples:

On 27 March 1990, the Tax Commission in Monza ruled that, "It is the opinion of this Commission that the nature of the activities carried out by plaintiff are apparently aimed at the dissemination of doctrinal and religious principles, and certainly not of a commercial nature." **Section 14**

On 20 September 1990, the Tax Commission in Torino stated that "the religious nature of Scientology is to be taken as ascertained.

"The fees given by believers for the services received and the contributions paid by them in order to receive services and various materials, doesn't change the essential nature of the services..." **Section 15**

On 25 November 1991, the First Tax Court of Como stated, "There remains no doubt as to the transactions under discussion being non-commercial in nature, thus tax-exempt." **Section 16**

Finally, on 2 July 1991, the Milano Appeals Court reiterated that the delivery of books and services by the Church in exchange for a fee is not a commercial activity and not subject to taxes.

A study of the financial intake of various religions found remuneration for local leaders of the Church of Scientology was 2.5% of the Church's gross intake but for staff and ministers of the Roman Catholic, Lutheran and Reformed (United) Churches remuneration amounted to 26.7%, 30.8% and 40.1% respectively.

The above statements and decisions, and many others, make plain that Scientology is a religion and that the Church of Scientology is organized for one purpose only: to disseminate the religious philosophy of Scientology to the people of Earth.

FALSEHOOD IN FINDINGS BY JUDGE BRECKENRIDGE:

The organization clearly is schizophrenic and paranoid.

TRUE INFORMATION:

This statement is completely absurd. Scientology, in its 42 years, has expanded to over 1,100 churches, missions and other groups throughout the world. That expansion is built on a solid record of helping people lead happier, better lives.

The Reverend Dean M. Kelley, Counselor on Religious Liberty for the National Council of Churches, has written that he has befriended "a number of Scientologists -- some high in the organization -- over the years.... I have found them to be earnest, enterprising, public-spirited and committed people...."

The Church of Scientology is also active in making improvements in the community; Scientologists are out there, involved, visible and effective.

The Church helped to create a safe environment during the riots in LA, when Scientologists surrounded an entire city block at Hollywood and Vine and earned the gratitude of neighbors for protecting their property. No weapons were carried by the Scientologists who formed this protective cordon. Yet the measure was effective. The Times of London noted that during the worst day of the riots, the city block guarded by Scientologists was one of the very few in Hollywood Boulevard where no business was torched or looted. **Section 17**

The Church also takes part in programs to assist the less fortunate. For many years the Church of Scientology in Los Angeles has worked with the Department of Children's Services of Los Angeles County to provide toys and Christmas holiday entertainment for foster children under the Department's care. These children are, most commonly, from broken families or are victims of abuse. The contributions made by Scientologists have resulted in many commendations from the Department.

In 1991-1992, numerous proclamations and expressions of support for the Church and its social reform campaigns have come in from mayors, politicians, law enforcement officers, artists and community leaders in the U.S., Canada, Britain, Italy, Australia, Mexico, Germany, France and many other countries.

The Church enjoys a high profile. In 1991, it completed the largest outreach campaign in its history, involving a series of full-page color ads placed in USA Today. These ads began in June and continued appearing every weekday, and later, every second weekday, continuously until October. The advertisements covered major areas where Scientologists are active, including the reform of the press and the exposure of psychiatric drugs and human rights abuses. Follow-up ads expounded on the religion of Scientology itself, including its beliefs, practices, and the personal testimonies and photographs of some of its members. Section 18

The Church concluded the series of ads with a public information campaign on the Internal Revenue Service which inspired more than 14,000 supportive letters and phone calls from readers of USA Today.

This campaign aroused intense media interest and established the Church of Scientology as one of the most powerful social reform groups in the world.

FALSEHOOD IN FINDINGS BY JUDGE BRECKENRIDGE:

The evidence portrays a man [LRH] who has been virtually a pathological liar when it comes to his history, background, and achievements. The writings and documents in evidence additionally reflect his egoism, greed, avarice, lust for power, and vindictiveness and aggressiveness against persons perceived by him to be disloyal or hostile.

TRUE INFORMATION:

Breckenridge based his comments on allegations made by Armstrong concerning Mr. Hubbard's past. Yet, Armstrong's incompetence as a researcher is well documented. Ironically, it was Armstrong's lack of research into the various facts and incidents regarding Mr. Hubbard's life that led him to his false claims.

In the court transcripts, Armstrong admitted to his own incompetence as a researcher.

While being cross-examined concerning his "research" regarding L. Ron Hubbard's career as an officer in the Navy during World War II, Armstrong stated the following about himself:

1. He was never trained in how to research a biography.

2. He never searched out and obtained official documents from any agency of the United States government.

3. He was not aware that there was an agency of the United States Navy that kept records of ships.

4. He never attempted to find out what data the Naval Historical Center had on the subchaser 815, the ship under the command of L. Ron Hubbard during World War II.

5. Armstrong concluded that Hubbard was not a Commander of a squadron of Corvettes

as he did not do the necessary research to locate the documents in Navy files which established that Hubbard was in command of a squadron of Corvettes (English term for subchaser). Armstrong was not even aware that the initials SC stood for Submarine Chaser.

When questioned during the trial on evidence substantiating Mr. Hubbard's combat record, Armstrong admitted that he merely "went through some books on the subject. But that was it. I never went to D.C. And I obviously never checked the sources that whoever did this research was able to check. So I stand corrected." **Section 19**

Armstrong also challenged Mr. Hubbard's claim that he (Mr. Hubbard) had been made a blood brother of the Blackfeet Indian tribe. Yet just recently that nation celebrated Mr. Hubbard's 70th anniversary as a blood brother.

A reliable account of Mr. Hubbard's career in the Navy is given by L. Fletcher Prouty, former senior US intelligence officer with the Pentagon.

Mr. Prouty, who joined the Army just a month before Mr. Hubbard joined the Navy, is experienced in reading and understanding military and intelligence records. There is an intelligence process called "sheep dipping," wherein additional or cover files are created which mask the true activities of the intelligence operative. Mr. Prouty's knowledge is based on firsthand experience in creating such files.

His analysis of Mr. Hubbard's files shows that there are at least two and more likely three separate and different files in existence: a "false" file created by the Navy; a personnel file; and a file which contains Mr. Hubbard's true activities as an intelligence officer. It is this last file which appears missing and therefore there is an incomplete record of Mr. Hubbard's career.

Detailed examples are provided in Mr. Prouty's affidavit. **Section 20**

Regarding Mr. Hubbard's medical history, Mr. Prouty points out that Mr. Hubbard's Notice of Separation paper indicates he was awarded the Purple Heart twice. The Purple Heart is awarded only to those wounded in action.

Another document from the US Naval Hospital in Oakland covers Mr. Hubbard's condition following the war:

"Eyesight very poor..." "Lame in right hip from service connected injury. Infection in bone... all service connected."

In sum, Mr. Hubbard's past is exactly what he stated it is and Breckenridge was completely misled by Armstrong's false claims.

Mr. Hubbard's achievements completely belie Armstrong's allegations and

Breckenridge's forwarding of them. Through hundreds of books and literally thousands of articles and lectures, L. Ron Hubbard communicated and taught the methods which today are used by millions to improve their own lives and the lives of those around them. His career spans more than 50 years during which he produced over 530 published works which have sold more than 100 million copies in more than two dozen languages. In developing the religious philosophy of Scientology, he delivered and recorded over 6,000 lectures. In country after country, he has received wide acclaim for his accomplishments in bettering mankind.

Of the more than 2,400 awards, recognitions, plaques, proclamations and letters of recognition L. Ron Hubbard has received for his writings and humanitarian work, the following are most notable:

The Saturn Award for Battlefield Earth awarded by the Academy of Science Fiction, Fantasy & Horror Films.

The Tetradrama D'Oro Award, a cultural award in Italy, awarded to L. Ron Hubbard as a world-renowned author contributing to the culture and peace of Earth.

In 1988 a plaque was awarded to L. Ron Hubbard by Publishers Weekly to applaud him for the release of his international bestseller in paperback, Mission Earth [Vol 1], considered a masterwork.

In the same year, The Publishers Weekly Century Award was conferred upon L. Ron Hubbard. It was awarded to commemorate the appearance of Dianetics on the Publishers Weekly bestseller list for 100 consecutive weeks.

The Sol de Oro (Golden Sun) award for Dianetics from the National Association of Journalists in Mexico City. This award is given to personalities with outstanding achievements in the fields of communication, art and culture.

The Golden Laurel for Human Sciences award, given to L. Ron Hubbard as a man of literature, an author and a humanitarian. Awarded for contributions to the betterment of the French Culture and its Community.

The Cosmos 2000 award, a French science fiction prize, awarded in 1989.

The Nova science fiction award. The Nova SF award was granted to L. Ron Hubbard posthumously for his contribution to Italian science fiction. L. Ron Hubbard is the only non-Italian writer awarded.

The Rosette (Golden Tie) award is presented once a year for outstanding achievement in the field of the arts by the French National Federation for Culture. The Golden Tie was awarded to L. Ron Hubbard as a writer for a lifetime of work in the enhancement of culture.

The Gold Medal from the Academy of Arts, Sciences and Letters in France was awarded to L. Ron Hubbard in 1990 for all his literary works and achievements. This committee was formed in 1915 as an academical society for education and enlightenment under the patronship of the famous French Academy, the most important literary institution in France.

This medal is given to the highest personalities in the fields of arts, sciences, literature and aviation.

In 1992, the prestigious State University of Moscow conferred a posthumous doctorate of literature upon Mr. Hubbard. **Section 21**

FALSEHOOD IN FINDINGS BY JUDGE BRECKENRIDGE:

The practice of culling supposedly confidential [counseling folders or files] to obtain information for purposes of intimidation and/or harassment is repugnant and outrageous.

TRUE INFORMATION:

This practice is not part of Scientology religious counseling. The Auditors Code, which binds all auditors and is the senior policy concerning Scientology counseling, places an obligation on the auditor to maintain strict confidentiality on all information divulged during auditing. Such information is protected by priest-penitent privilege.

In his decision, Breckenridge referred to a Guardian's Office policy letter written by Mary Sue Hubbard which had allegedly authorized the practice of culling information from counseling folders. Any such directive is not part of the Scientology scriptures and was long ago canceled.

As mentioned above, the Guardian's Office was disbanded by current Church management when it was found to have veered wildly off Church policies as laid down by Mr. Hubbard.

In May 1992, Mr. David Miscavige, chairman of the board of the Religious Technology Center which has final responsibility for ensuring the purity of application of Scientology, testified that he had personally removed Mary Sue Hubbard from her position at the head of the Guardian's Office. Following her removal, Mr. Miscavige and other senior Church officials restructured the external-facing activities of the Church from scratch and incorporated them within the overall management structure of Scientology. **Section 22**

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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California Non-Profit Religious Organization, Plaintiff, vs. STEVEN FISHMAN and UWE GEERTZ, Defendants.	CASE NO. CV 91-6426 HLH(Tx) **DECLARATION OF DAVID MISCAVIGE**

I, DAVID MISCAVIGE, declare and say:

1. I am over 18 years of age and a resident of the State of California. I have personal knowledge of the matters set forth in this declaration and, if called upon as a witness I could and would competently testify thereto.

2. I am not a party in the above-referenced case, nor am I

affiliated in any corporate capacity with the plaintiff, Church of Scientology International ("CSI"). I make this declaration for several reasons. First, until January 4, 1994, the date on which I was informed that my deposition had been ordered in this case by Magistrate Judge Tassopulos, I had no idea that I would be required to testify in this case. I was never served with any subpoena for such testimony, I have never had any contact whatsoever with either defendant, and I had nothing whatsoever to do with this case until now. In fact, it was not until January 6, 1994, after my deposition had been ordered, that I first read the outrageous papers filed by Geertz's counsel when he sought to have my deposition ordered. Second, upon reading those papers, I discovered that Geertz's counsel made arguments to the Magistrate Judge that gave her the absolutely false impression that I was evading service of subpoena. It caused me great concern to learn that the Magistrate Judge had asked, "Why has Mr. Miscavige avoided service?" I did no such thing, and were it not for the baseless allegations which Geertz's counsel proffered, I believe the Magistrate Judge would instead have asked Geertz's counsel, "Has Mr. Miscavige been served?" The truthful answer to that question is "No." Third, my lawyers' efforts to arrange for my deposition to be taken have been rebuffed by Geertz's counsel, who, at the same time, is threatening to move for a contempt citation against me for not appearing at a deposition he has refused to schedule. It is inconceivable to me that Geertz's counsel can seriously contend that I am to blame for a deposition not going forward when he has refused to depose me. Finally, in the course of these proceedings, Geertz's counsel, Robert Vaughn Young and Stacy Young have made a number of allegations about me and about the Scientology religion which require a response, so there can be no doubt that those allegations are false.

3. I have read the vile declarations filed by Vaughn and Stacy Young in this case. It is clear to me that the false allegations they have filed have been offered solely for the purpose of making me the centerpiece of this litigation, and that their motivation is to forward a litigation tactic of harassment to the point of a hoped-for default by the only laintiff to this action, CSI. The foregoing is based on the falsity of the claims they have made, my personal knowledge that both of these individuals are not qualified to testify to the matters they have addressed by declaration, and because I have seen the same litigation tactics used before in instances where Vaughn Young would have learned this "technique." Therefore, this declaration is submitted to demonstrate that I have no knowledge of the defendants in this case, to set the record straight concerning the false allegations of Vaughn and Stacy Young, and to comply as fully with the court order concerning my deposition as Geertz's counsel's actions permit, since Geertz's counsel has declined all opportunities to do so. I also submit this declaration because I feel the Court has been poisoned into believing that I have had some role in this litigation by the statements of the Youngs and counsel for Geertz, to which I have neither responded nor even had the opportunity to respond.

BACKGROUND

4. I have been a practicing member of the Scientology religion since 1971. In 1976, I joined staff of the Church of Scientology of California (and the Sea Organization -- the Scientology religious order). During my tenure in this corporation, I held many positions. In 1977, I had the opportunity to work directly with L. Ron Hubbard in many different capacities. In 1978, Mr. Hubbard was engaged in the production of Scientology films which had the purpose of training Scientology counsellors (called "auditors") in the practice of Scientology. During this time I was the Chief Cameraman. Later, I worked directly with Mr. Hubbard as a member of the Commodore's Messenger Organization ("CMO"), which duties consisted of assisting Mr. Hubbard in whatever activities he was engaged in. The functions are best described as an assistant. Later, when Mr. Hubbard went into seclusion to continue his researches on Dianetics and Scientology, and to engage in his own writings, I became part of a newly formed CMO organization, CMO International.

5. CMO International's role was to see that the management of the Church operated in accordance with Scientology policy and technology. The title of my position was Action Chief. In short, this post was responsible for missionaire activities of the Church, where personnel from the Mother Church would travel to different parts of the world to see to the proper operation of various Church activities and to take corrective action where necessary. The types of missions I generally supervised were those that saw to the correct functioning of the

Church management and the correction thereof.

6. From the beginning of 1982 until March of 1987, I was Chief Executive Officer and later Chairman of the Board of Author Services, Inc. ("ASI"), a California corporation which managed the personal, business, and literary affairs of L. Ron Hubbard. Later in this declaration, I describe how I came to that position.

7. Since March of 1987, I have been Chairman of the Board of Religious Technology Center ("RTC"), a California non-profit religious corporation recognized as tax exempt under Section 501(c)(3) of the Internal Revenue Code. RTC is not part of Church management, nor is it involved in the daily affairs of various Church of Scientology organizations or missions. RTC ensures that the trademarks of Dianetics and Scientology, and the technology they represent, are properly used around the world. It exists to see that Dianetics and Scientology technology is safeguarded, is in good hands, and is properly used.

8. RTC was formed with the specific purpose of seeing that the religion of Scientology was kept pure and true to the source materials of the religion. In fact, a major reason for its formation was to have such a Church organization that performed these functions in a capacity entirely separate from the actual management of the various Churches and Missions of Scientology. Not only is RTC not involved in the management of the international hierarchy of Scientology churches, but its very existence and performance of its true functions depends on the fact that it is NOT part of Church management. The authority of the Religious Technology Center stems from the ownership of the

trademarks of Dianetics and Scientology. In brief, RTC's maintenance of these trademarks is threefold: A) ensuring that when something is represented as Dianetics or Scientology, that it actually is; B) seeing that any organization representing itself as Dianetics or Scientology (and using those names), while actually being something entirely different, is prevented from doing so; and C) seeing that anyone offering Scientology, but calling it something else (a name other than Dianetics or Scientology) is prevented from doing so. I could give various such examples where actions listed in B) and C) have actually occurred, although it is not necessary here. Suffice it to say that when such has occurred, RTC has acted, with litigation when necessary, and has been able to uphold the proper use of the marks in every instance.

9. As Chairman of the Board, the most senior position in RTC, I am uniquely interested in the standard application of the Scripture of Scientology as detailed in Hubbard Communications Office Policy Letters (HCO PLs) and Hubbard Communications Office Bulletins (HCOBs) and the spoken words of Mr. Hubbard on the subjects of Dianetics and Scientology as recorded on audio tape, video, film and, in some cases, written transcriptions of these materials. I inspect and correct departures from the standard application of the Scripture of the religion. I also ensure that any attempted perversion of the technology of Dianetics and Scientology is rapidly dealt with, to keep the religion pure so that all people may benefit from the application of Mr. Hubbard's breakthroughs in the fields of the mind, the spirit and life.

10. In the course of my duties I travel widely. I often

appear at Church events and briefings which serve to keep Scientologists around the world aware of the widespread application of Mr. Hubbard's writings. In all such appearances, my position as Chairman of the Board of RTC is known, as is its distinction from actual Church management officials of CSI. I also oversee the affairs of the Religious Technology Center in its function of verifying that the source writings of the religion are kept pure. This specifically includes the verification that the materials representing themselves as being Dianetics and Scientology are in fact that, and that they honestly reflect the source writings of the religion by L. Ron Hubbard. I also oversee RTC's function of assuring that the trademarks of Dianetics and Scientology are legally registered and kept current in over 190 countries around the world.

11. Neither RTC nor I has any corporate authority over any Scientology church, including CSI. CSI is the Mother Church of the Scientology religion and has been since its inception in 1981. As such, CSI is responsible for the activities commensurate with such a role, including the ecclesiastical management of Churches, dissemination and propagation of the faith and defense of its activities, including external and legal affairs. All of the foregoing facts were submitted to and thoroughly reviewed by the Internal Revenue Service prior to the recent recognition of the tax-exempt status of CSI, RTC and a host of other Church corporations and entities.

FAILURE TO SERVE SUBPOENA

12. Apparently Geertz's counsel made some attempts to serve

me with a deposition subpoena in Los Angeles in December of 1993, when I was away from California on business in the United Kingdom and Washington, D.C. I keep a busy schedule that requires extensive travel in the course of handling a wide range of ecclesiastical duties, and my schedule has nothing to do with the presence or absence of process servers. In January, I was away on business in Clearwater, Florida and Washington, D.C. In Washington, I met with the head of Interpol, Raymond Kendall, on one of the days that Geertz's counsel unilaterally set for my deposition. This meeting had been arranged for more than a month and since this individual was travelling all the way from Interpol headquarters in Europe, it was hardly something I could cancel. During that same week, and on another day arbitrarily set for my deposition, I met with IRS officials in a similarly pre-arranged meeting. In fact, I was only home for approximately 25 days in all of 1993. I was simply not in the State of California during the entire time in which service attempts on me were apparently being made. I understand this fact was made known to the Magistrate Judge in this case and later to the Court. To this day, I have never received a subpoena in this case.

13. Any suggestion that I try to avoid giving testimony is just false. In May of 1992, I testified at a legal proceeding in Toronto, Canada, although there was no legal means to compel my testimony. I testified for four full days in the summer of 1993 in Church of Scientology International v. Eli Lilly, et al., a case pending in federal court in Washington, D.C. There are over 1100 pages of deposition transcript that comprise that deposition, with very little in the way of objections or

colloquy. I did so because I knew my testimony was needed and relevant. In 1990, I was deposed for two full days in Bent Corydon v. Church of Scientology International. In that instance, I was "rewarded" for appearing by having plaintiff's counsel serve me with various subpoenas in other disrelated matters. In both Lilly and Corydon, the opposition first attempted to notice my deposition while concurrently arguing that I would "refuse to appear." In each instance I was forced to refute such nonsense and in fact did appear. To claim that I evade service or avoid being deposed or otherwise avoid giving testimony is nonsense on its face.

14. I want the Court to be aware that upon learning that my deposition had been ordered by the Magistrate Judge on January 4, 1994 and upon reading the allegations that apparently led to that order, which I first read on January 6, 1994, I consulted with my counsel in this matter, who advised that I seek the Court's review of the Magistrate Judge's order concerning my deposition. At the same time, I also instructed my counsel that in spite of the fact that I had no knowledge of the issues raised in this case, and in spite of the lack of any service of a subpoena on me, and in spite of the fact, as noted above, I was to be out of town for much of January, counsel should try to make arrangements for my deposition to be taken, should the Court not reverse the Magistrate Judge's order. Efforts to make such arrangements commenced on January 10, 1994 and continued through February 4, 1994. I am informed that Geertz's counsel was not willing to discuss a mutually acceptable date for my testimony, particularly at the end of that period, when Geertz's counsel

declined even to propose a date for my deposition. In the meantime, while refusing to depose me, he threatens me with contempt for not having been deposed. I am convinced that this entire tactic of attempting to bring me into a case where my only involvement stems from this pursuit of my testimony, is for the purpose of harassment and to forward a litigation tactic of avoiding litigation of the actual case by use of abusive and irrelevant discovery tactics.

15. As a result, I feel I should make whatever effort I can to set the record straight on many of the false and inflammatory allegations that have been injected into this case. Therefore, I am using this written declaration to inform the Court of what my testimony would have been. I also am making my testimony available, because of my great concern that my name has been attacked in such a way that the Court has made rulings regarding my appearance based entirely on falsehoods presented by Geertz's counsel and Vaughn and Stacy Young.

NO KNOWLEDGE OF DEFENDANTS

16. I first heard the name Steven Fishman in the summer of 1990, when it was brought to my attention that someone by that name had been sentenced to prison for mail fraud and obstruction of justice and that in the course of being sentenced, he had referred to me by name and it had been alleged that illegal acts he had committed were as a result of Fishman being "implanted" and caused pain by inserting BIC pens in his penis and forcing him to smell human feces. As I had never heard of Fishman and because the allegations were such tabloid rot, I assumed this was

some new form of "insanity defense" and that Fishman had picked my name out of the press or something. I never thought about the matter again, until 1991, when I read the 8 page cover story in Time Magazine concerning CSI in the May 6, 1991 edition. At no time, either before or since I read their names in that magazine, have I met with, spoken to, communicated with or otherwise had any contact or communication of any kind with either Geertz or Fishman. It was when I read that article that I first heard the name Uwe Geertz.

17. Geertz has submitted copies of purported correspondence from defendant Steven Fishman to Church members making reference to me as a participant in Fishman's mail fraud crimes. These references to me are pure fiction. Indeed, I have been informed that CSI has filed with the Court an unrebutted declaration of a typewriter expert who concluded that these letters could not have been created on the dates claimed by Fishman.

18. Other than the falsified documents of a convicted felon, the defendants have identified no other "evidence" that I even knew Fishman, much less ordered or condoned crimes for which he was imprisoned. Instead, Geertz has submitted two vicious declarations, from Vaughn and Stacy Young, which attack and vilify me personally without reference to any issue in this case. Most significantly, neither of the Youngs ever suggests that they ever heard me or any other senior official in the Scientology religion mention Steven Fishman or Uwe Geertz in their presence. At no time does either one even suggest that they know anything that connects me to any issue in this case. The reason they have failed to do so is clear: they have no such evidence of my

involvement with Fishman or Geertz because no such evidence exists.

19. Exemplifying the unsupportable, irrelevant and malicious nature of Vaughn Young's personal assault on me is his false and repugnant insinuation that I was involved with the death of my mother-in-law, Mary Florence Barnett. Not only is there no evidence to support this claim by Young, but there is clear evidence to the contrary. With the reports of the coroner and the medical examiner's investigator, and with the deposition of the medical examiner taken by Geertz's counsel at hand -- all to the unanimous, unequivocal conclusion that Ms. Barnett died from self-inflicted gunshots -- Young has the temerity to suggest that I should be investigated to determine what he calls my role in that tragic suicide. With complete disdain for the facts and no regard whatsoever for any sense of decency, Young has taken a personal tragedy in my family's life, the suicide of my mother-in-law, and attempted to make this an issue in this lawsuit by twisting it to imply non-existent wrongdoing on my part. I not only had nothing to do with this tragic incident, but Vaughn Young's gratuitous embellishment that I ordered the matter "hushed up" is equally false. My only association with this tragedy was to console my wife who was understandably emotionally traumatized and grief stricken. Vaughn Young's effort to exploit this tragedy is malicious in and of itself, but his innuendo and attempts to recast the incident, despite the uncontroverted evidence as to the true cause of Ms. Barnett's death, show the depths to which he is willing to sink.

20. At this point, I have stated all I know of Steve

Fishman and Uwe Geertz and anything that could possibly be relevant to this case. However, Vaughn and Stacy Young have taken it upon themselves to introduce into this case their version of my history with the Church. I cannot understand the relevance of this under any circumstances, but since counsel has now refused to take my deposition while concurrently levelling threats, I feel I am forced to give a brief history of what actually occurred to be in compliance with the Court's order if such is considered relevant, and to show in proper context how Vaughn and Stacy Young are simply incapable of competently testifying to events they have "described" in their declarations.

HISTORY OF FALSE ALLEGATIONS

21. False allegations leveled against me in the context of litigation or in the media are nothing new. I raise this point only so that the Court will understand that the sort of scurrilous personal attack on me launched by Geertz's counsel and Vaughn Young is the latest in a pattern of such attacks in litigation over the years. I recognize that it is not uncommon for leaders of organizations and movements to be subjected to such attacks. I can only assume that I am attacked because I am visible as the ecclesiastical leader of the Scientology religion. I note that I am the ecclesiastical leader of the religion, not the Church. The mischaracterization of my role made by the editors of Premiere magazine in an editorial note cannot convert me from the leader of the religion to the head of the Church. Neither can the imprecise use of language by Ted Koppel on ABC's Nightline Show. Both of those erroneous designations are

examples of the media not understanding the nature of what I do or the nature of my relationship to the Church. In the case of Premiere, the same article that contained the erroneous statement by the editors, also contained a photo caption which I did compose and which did correctly identify my position as "David Miscavige, Chairman of the Board of Religious Technology Center, Holder of the Trademarks of Dianetics and Scientology." On "Nightline," I was sitting on live, nationwide TV, engaged in rebutting a set up video for the show, containing 15 minutes of false and outrageous charges about Scientology and did not deem it important to pause from correcting those false charges so I could educate Mr. Koppel on matters of corporate structure.

22. My name has now been dragged through the mud in this litigation, not only by means of a mean-spirited personal attack, but also as part of what appears to be a tactic of hurling false and irrelevant allegations against Church of Scientology International, the Scientology religion and its Founder. It is unfortunate that I am now put in the position of defending my reputation and refuting lies about my religion that have become part of the record in this case. In that regard, I must note that in reviewing the sordid and outrageous allegations made about me by Geertz's counsel and Mr. Young, I was struck by their technique of using vague, innuendo-filled vignettes and unsubstantiated rumors in an effort to sound authoritative. I was also struck by the way that their declarations attempt to portray normal things as abnormal. I can only submit that trying to make the usual seem strange and trying to color events by innuendo are the tools by which bigotry is crafted and prejudice

is spread.

23. The personal attacks on me, as well as many other irrelevant and malicious falsehoods that have been brought in this case, have largely been introduced through declarations of Robert Vaughn Young and Stacy Young and forwarded by Geertz's lawyer, Graham Berry. The Youngs left Scientology almost five years ago, have no personal knowledge of the current activities of RTC, CSI, or any other part of Scientology and, by their own admission, have no personal knowledge of the defendants in this case. Neither Vaughn nor Stacy Young ever worked with me or even near me during the entire time I have been employed by RTC. They couldn't possibly testify to any of my activities as RTC's Chairman of the Board since 1987 because they simply were in no position even to observe such activities. They are not experts on anything relating to Scientology, but have apparently been hired to file inflammatory declarations on non-issues in this suit. The Youngs are, however, generally aware of the fact that, through the years, attempts to malign me personally and create a false picture of the Church with sensational allegations have been the stock-in-trade of litigants opposing the Church and the former Scientologists upon whom counsel rely to swear to matters they do not know and to make false allegations for which they have no basis. I believe that the Youngs' awareness of that litigation ploy explains their involvement in this case and defines the role they are playing.

24. For example, part of Vaughn Young's attack is his complete mischaracterization of my role in the dismantling and permanent disbanding of the Guardian's Office ("GO"). The

Guardian's Office and the fallout that resulted from it is particularly significant as it is the linchpin of a litigation tactic that has been employed for years against me and the Church. Vaughn Young is simply revisiting the same path trod by others before, but as this has now been injected into the case I feel it important to address this matter, even if necessarily briefly.

25. Young would have the Court believe that I was an opportunist, using the jailing of Mary Sue Hubbard as a means of taking control of the GO, while leaving its criminally tainted substance unchanged and operating under a different name. This is a complete perversion of the true events, as set forth below. I would not have expected Young to know all of the details of how I directed the disbanding of the GO and the permanent expulsion of its leaders and other wrongdoers, as he was in a low level position in the GO at the time. However, he knows that when the staff of other Church units completely took over the GO offices and put an end to it as an organization, literally hundreds of his fellow GO staff members were dismissed, expelled from the religion, and forever barred from ever holding any position in any Church organization again.

DISBAND OF THE GUARDIAN OFFICE

26. To understand the magnitude of this upheaval, a description of the history, power and authority of the GO is vital. The GO was established in March of 1966 because legal and other external facing matters were consuming the time and resources of Churches of Scientology. In particular, Church

leaders were being distracted from their primary functions of ministering to the spiritual needs of their expanding religious communities and building their organizations. During the 1970s the GO operated as an entirely autonomous organization unchecked and unsupervised by the ecclesiastical management of the Church. The power of the GO was absolute. Unless a member of the GO, one could not even enter their locked offices. They held all corporate directorships. They and they alone dealt with legal affairs of the Church. The GO operated in complete secrecy, and conducted its affairs independently of the Church and its management and personnel. Any attempt to find out their affairs, by Church ecclesiastical staff or any Scientologist, was met with the same "treatment" they handed out to others. For instance, GO staff carried out illegal programs, such as the infiltration of government offices for which eleven members of the GO were prosecuted and convicted. There were also instances in which GO staff used unscrupulous means to deal with people they perceived as enemies of the Church -- means that were completely against Scientology tenets and policy, not to mention the law.

27. In 1981, a Church investigation was begun into the activities of the GO. That investigation was prompted by the existence of a number of civil law suits which had been filed at that time against Church of Scientology of California and Mr. Hubbard, and which the GO was supposed to be responsible for handling. Not only was the GO not handling these suits, the GO, and particularly Mary Sue Hubbard, even refused to answer our questions about the suits because they viewed themselves answerable only to persons within the GO. My involvement in the

purge of the GO arose from my position at the time, Action Chief CMO International. My duties included directing Church missionaires conducting the investigation of the GO to determine the reasons for the GO's ineffectiveness and why the GO had departed from its original purpose.

28. Our attempts to get information were thwarted by Mary Sue Hubbard. She informed us that she did not appreciate our investigation of the GO and that if one were needed she would do it. In March 1981 she cut all of our communication lines to the GO, except through herself. It must be noted that Mary Sue Hubbard believed her position as Controller and as the "Founder's wife" to be unassailable and beyond reproach by anyone but Mr. Hubbard -- who was not around at the time, a fact that she was well aware of. This, plus her absolute control of the GO, made it difficult for the Church missionaires to get anything done.

29. In April 1981, in an unprecedented move and without Mary Sue Hubbard's knowledge, I sent a mission to the headquarters of the GO in England -- GO World Wide ("GOWW") -- to inspect the Legal Bureau under the guise that it had been authorized by Mary Sue Hubbard. What the mission found confirmed our worst suspicions.

30. We discovered that the GO had grossly mismanaged the legal affairs with which it had been entrusted, and displayed a disdain for the basic policies by which a Scientology organization is supposed to be guided. Whatever else the GO was, it was not Scientology, and it was not adhering to Scientology policy. Moreover, the GO continued to withhold from Church management the darkest of its secrets -- the criminal acts

committed by GO staff against the United States government and others. We only learned of these crimes when we read copies of GO documents attached as exhibits to court papers filed by litigation adversaries. These documents had been removed by the GO from its own files in order to continue to hide their criminality from the Church. While the FBI had seized these documents in their 1977 raid of the Church, the GO had obtained an order sealing these materials from the public, including the Church. During a short period, the Court had lifted its sealing order and litigation adversaries obtained copies. And that is why we were only able to start discovering these acts when filed by the opposition in civil litigation.

31. When further investigation proved the documents to be authentic, it was made clear that we had no choice but to overthrow the GO and dismiss everyone who had violated Church policy or the law. These activities ultimately led to a complete disband of the GO. I gathered a couple of dozen of the most proven Church executives from around the world and briefed them on the criminal and other unethical conduct of the GO. Together, we planned a series of missions to take over the GO, investigate it and reform it thoroughly. On July 13, 1981, a matter of weeks after we had uncovered what was going on, and with no advance warning to the GO, a coordinated series of CMO missions were sent out concurrently to take over the GO.

32. However, there were a number of obstacles to overcome before the termination of the GO could be accomplished. Mary Sue Hubbard was still asserting her authority over the GO from her position as Controller. Contrary to Young's statements, she was

not in jail, but was still very much in control of the GO. At the same time, Mary Sue Hubbard was covertly attempting to expand her power through her friendship with and influence over Laurel Sullivan, a Church staff member who was in charge of a project she referred to as the "MCCS project" -- the purpose of which was to "sort out" the corporate structure of Church of Scientology of California.

33. Instead of addressing a sensible reorganization of that Church, Sullivan and her GO supporters were making their own plans to establish trusts and for-profit entities which would have placed even greater corporate control of the Church in the hands of Mary Sue Hubbard and other GO executives in a fashion that would have assured the permanency of GO dominance and power.

34. Shortly before the purge of the Guardian's Office, I discussed with Laurel Sullivan various illicit GO activities we had already uncovered. Sullivan was aware of these activities. Sullivan did not agree that the acts the GO had committed were atrocious and that Mary Sue Hubbard and the rest of her criminal group needed to be removed. She insisted that Mary Sue Hubbard remain in power and that at all costs she and the Guardian's Office should maintain total control of the organization regardless of the criminal acts exposed by the government and others, in which Sullivan felt the GO was completely justified in committing.

35. Upon learning of Laurel Sullivan's alliance with the GO and the plans to reorganize the Church under Mary Sue Hubbard and her GO allies, I removed Sullivan from her position and disbanded the MCCS project altogether. In fact, recently released

documents reveal that Laurel Sullivan -- who would later become an adverse witness against the Church and me -- long ago admitted to law enforcement officials that the corporate restructuring of the Church actually implemented, differed entirely from that envisioned in her MCCS project.

36. Contrary to Young's claims, Mary Sue Hubbard was removed from her post before she went to jail. I know, because I personally met with her and obtained her resignation. Vaughn Young was not present at that meeting nor was he present at any of the events described here. He does not and cannot know what occurred. I do. At first, Mary Sue Hubbard was not willing to resign. Eventually she did so. Mary Sue Hubbard and the GO, however, did not simply capitulate.

37. Within a day of Mary Sue Hubbard's resignation, senior GO officials secretly met with Mary Sue Hubbard and conspired to regain control of the GO. Mary Sue Hubbard signed a letter revoking her resignation and condemning the actions of the CMO. Scores of GO staff responded, locking the missionaires out of their premises and were intending to hire armed guards to bar access by me and the other Church officials who had ousted them. I then confronted the mutineers, and persuaded Mary Sue Hubbard to again resign, which ended the last vestige of GO resistance.

38. When it was decided that cleaning up and maintaining the Guardian's Office in any form was not workable and that it needed to be disbanded altogether, this was accomplished by a new series of CMO Int missions sent to GO offices around the world. The pattern of the missions was to remove all GO staff from their positions and put them on estates work and physical labor around

the church. Before being disbanded the GO's Finance Bureau had monitored some aspects of the Church's finances, including the production of and maintenance of accounts and financial records. With the disbanding of the GO, this function was taken over by the International Finance Network, where it remains. Public relations activities were put under the direction and supervision of the L. Ron Hubbard Personal Public Relations Officer International and his staff. All GO social betterment functions - drug rehabilitation, criminal rehabilitation and educational reform, were taken over by a new organization known as Social Coordination. Later this function was assumed by Association for Better Living and Education ("ABLE"), recognized as a tax-exempt organization by the IRS. To administer legal affairs, the Office of Special Affairs ("OSA") was formed from a mixture of Sea Org staff who had been on one or more of the missions that had disbanded the GO, new staff recruited to work in the area and some former GO staff who had survived investigation and scrutiny and had undergone ethics clean-ups relating to their former affiliation in the GO. Completely unlike the GO, the Office of Special Affairs is not an autonomous group. OSA International is part of the Flag Command Bureaux and the highest OSA management position is that of CO OSA Int. The Watchdog Committee has a WDC member, WDC OSA, whose sole job is to see that OSA Int effectively performs its functions and operates according to Church policy. Local OSA representatives, called Directors of Special Affairs, are staff at their local church subject to the supervision of the church's Executive Council.

39. To further ensure that the old GO influence was

completely terminated, all "Guardian Orders," the non-standard issues which GO staff followed instead of Mr. Hubbard's policies, were canceled. These numbered in the thousands. Today, none of the individuals involved in the criminal activities of the Guardian's Office are serving on the staff of any organization within the Church hierarchy. During the years 1981 through 1983, the Church kept a record of the names of individuals we found to have been involved in illegal activities, who condoned them, or who were in a position where they should have known and done something to stop them. Any individuals who were found at that time to be on staff were dismissed and informed never to apply for re-employment. A list of names of ex-GO members either involved in, condoning, or being in a position to stop criminal acts is maintained by the International Justice Chief (IJC) at Flag Bureaux. Church organizations are required to check with IJC prior to hiring any ex-Guardian's Office staff member; that means anybody who was ever employed by the GO, whether he was involved in or cognizant of any criminal acts or not. The IJC then checks the names against the list of those banned from staff and informs the local Church organization whether it can hire the individual or not. The Church has thus ensured that no individuals involved in the criminal activities of the GO ever serve on staff. Ironically, the lone exception, discussed below, was created by Vicki Aznaran.

40. Vaughn Young displays his ignorance of the actual facts concerning the dissolution of the GO, for this was no mere "cosmetic alteration," as he so ridiculously asserts. In a police interview, Laurel Sullivan, the GO ally and architect of the

stillborn MCCS project, characterized the purge of the GO as a "blitzkrieg," in marked contrast to Vaughn Young's vastly understated description. It was, in fact, a major, dramatic, and permanent overhaul, with over 800 GO staff dismissed as unqualified or because of their disagreements with Church policies or because of their complicity in criminal conduct. It required approximately 50 separate missions to purge the GO. The posts of Guardian and Controller were abolished.

41. As a direct result of the GO corruption and its ultimate overthrow, the Church embarked on a complete corporate reorganization, in part to prevent such criminality from ever occurring again and to make sure a "new GO" could never come about. This is where CSI and RTC came into existence and the reasons for their place in the Church hierarchy are clearly stated in the Church of Scientology International reference book What is Scientology?

> NOVEMBER 1, 1981
>
> The Church of Scientology International was founded, signaling a new era of Scientology management. A strong standardized corporate structure was required to facilitate the rapid expansion of Scientology and maintain high ethical standards in a widespread international network of churches. This followed a series of Sea Org inspections that discovered that the Guardian's Office (which had been established in 1966 to protect the Church from external attacks and care for its legal matters) had become entirely autonomous and corrupt. The Guardian's Office had been

infiltrated by individuals antithetical to Scientology and had become an organization that operated completely apart from the day-to-day activities of the Church. Their secret actions in violation of Church policy had resulted in eleven members being jailed for obstruction of justice. Sea Organization executives overthrew the Guardian's Office and disbanded it. Part of the measures taken to ensure a similar situation could never recur was the formation of the Religious Technology Center on 1 January 1982. L. Ron Hubbard bestowed the trademarks of Scientology to RTC, whose purpose is to safeguard the proper use of the marks and ensure they remain in good hands and are properly used.

42. Vaughn Young calling the dismantling of the GO "cosmetic" is the functional equivalent of someone referring to World War II as a "tiff." He wasn't where the dismantling occurred, he doesn't know what happened, and he has no clue.

43. It is important to point out how far from the actual practice of Scientology the GO had departed and to point out the reason that Young is attempting to trivialize the purge of the GO. Unless Young characterizes the GO dismantling as "cosmetic," he cannot argue that his allegations of what he calls "Fair Game" continued to be committed after the GO was eradicated. It is a standard ploy for opposing litigants to point to the GO and allege "Fair Game" being practiced today on the basis of what the GO did thirteen or more years ago. In Young's "Fair Game" accusations, he is merely trying to stigmatize the Church today by dredging up the type of illicit activity in which the GO

indulged and falsely ascribing it to the people who are responsible for ridding Scientology of the GO. What the GO did in the 1970's was not pursuant to "Fair Game." One should call their actions by the precise term that describes them: illegal. But which side was Vaughn Young on during the early 1980s when all of this criminal conduct came to light? I was cleaning out the GO; Young was in the GO. We became aware of the acts of the Guardian's Office and were more horrified by the GO and its crimes than law enforcement officials and others outside the Church. Eleven people were indicted by the authorities; we discharged 800 GO staff. There isn't one iota of evidence concerning my involvement in any GO activities, or that of any other current Church executive. None of us had any involvement in the GO other than to obliterate it forever. Moreover, there isn't one iota of evidence that any current Church staff or executive ever engaged in any conduct reminiscent of the GO.

44. Once the Guardian's Office was disbanded there was much that needed to be done to deal with the legal and public relations matters that had been mishandled by that office for so many years. The years of neglect and the GO's destructive acts had put the Church in a position where it was repeatedly being attacked in civil cases, and even the Founder of the religion was being pulled into these suits, despite the fact that he had no connection with any of the claims or acts alleged by civil litigants.

FORMULATION OF AUTHOR SERVICES

45. Mr. Hubbard took no part in the disbanding of the GO or

removal of Mary Sue Hubbard. In fact, the first he heard of it was five months after the initial purge, in July of 1981. While he had been out of communication and uninvolved in Church activities for the previous two years, he had engaged in further researches on Dianetics and Scientology. More relevant, however, was that he had also, for the first time since the release of Dianetics in 1950, resumed his writing of fiction. Mr. Hubbard understood that the representation of these works and their publication could not be handled within the Church. Accordingly, in 1982, Author Services was formed to manage the personal affairs of L. Ron Hubbard including his literary, financial and legal matters. As I was held in some regard by Mr. Hubbard, I was given the opportunity to be part of this new endeavor. Beginning in 1982, I devoted my full time and attention to Mr. Hubbard's personal affairs from my position as Chief Executive Officer of Author Services. Young's contention that I was somehow managing all Scientology Churches internationally at the same time that I was supervising Mr. Hubbard's affairs is preposterous.

FALSE ALLEGATIONS AS A LITIGATION TACTIC

46. Since the purge of the GO, I have been repeatedly forced to deal with the points of false allegations that Mr. Young has made here, as well as other lies circulated by a handful of the very individuals I had kicked out. I have become the target of attack for the activities of the very individuals I purged from the Church. In this litigation, Fishman has made numerous allegations about my "involvement" in his criminal

enterprise. These allegations are not only false, but resulted in his criminal conviction. Vaughn and Stacy Young have littered the record of this matter further by giving "expert" testimony to support Fishman's allegations by stating, "they might have occurred" based on the acts of the old GO. This is not the first time this tactic has been used as a litigation ploy to harass me and divert the Court's attention from the actual facts in litigation. Each time similar allegations have been raised in the past, however, I have been completely vindicated.

47. The first bizarre episode -- of which Mr. Young is aware, but of which he makes no mention -- illustrates Mr. Young's knowledge of the tactic of generating false allegations as a litigation ploy. This particular episode led to an FBI investigation and a bogus lawsuit, but ultimately led to complete exoneration of me. Shortly after I became Chief Executive Officer of ASI, a call came in to ASI from a New England-based bank. The phone caller was calling to verify that a check supposedly signed by Mr. Hubbard should be cleared. After ascertaining that the check was not valid, I stopped payment on it in my capacity as the Chief Executive Officer of Mr. Hubbard's personal, business and literary agency. The matter of this forged check, however, assumed even greater proportions when a so-called "probate" action was commenced against the "estate" of L. Ron Hubbard.

48. The probate action was filed by a Boston-based personal injury attorney who induced Ron DeWolfe (L. Ron Hubbard's estranged son who had long since been written out of his will), to claim that Mr. Hubbard's estate was being looted

and that DeWolfe should be appointed to "protect it." This Boston attorney was the same one who had pending literally dozens of damage suits naming Mr. Hubbard and which portrayed the Church and the religion's Founder in the most outrageous and prejudicial manner imaginable. Yet, suddenly, in the probate action, that lawyer was suing to "protect" Mr. Hubbard's estate.

49. To buttress the false claim that Mr. Hubbard's estate was being looted, DeWolfe and his lawyer made reference to the forged check mentioned above. I had no idea how they were aware there had been an attempt to pass a forged check on Mr. Hubbard's account. Upon examining the facts we were able to develop, we learned that the bank had informed the FBI about the forged check, and that the first and only person the FBI contacted for information was this same Boston attorney, who told the FBI that I, one of Mr. Hubbard's closest and trusted friends, was the most likely candidate to have committed the forgery! As a result, I became the target of an FBI investigation, even though I had been the one who stopped payment on it when I was alerted to the check's existence. Eventually, the entire probate case was dismissed and I was cleared of any involvement with the forgery. Nonetheless, I had been unjustly subjected to negative press in all manner of media publications literally all over the world. Furthermore, this incident of the forged check and the probate case marked the emergence of a new litigation tactic, one that Vaughn Young and Geertz's counsel are trying to exploit here.

50. Upon the dismissal of the probate action, DeWolfe's attorney announced that his "real" purpose in bringing the probate action had been to force Mr. Hubbard out of seclusion so

he could be served in the civil damages cases filed by DeWolfe's lawyer. The idea was simple. Aware that Mr. Hubbard wanted to maintain his privacy and seclusion, the lawyer would notice Mr. Hubbard's deposition as both an individual and as a "managing agent" of the Church. Default or settlement then would follow a managing agent finding and non-appearance. This ploy was particularly effective since Mr. Hubbard went completely out of touch with any and all Church entities from May of 1984, until he passed away in January of 1986. Even if they had so desired, the Church was literally incapable of presenting Mr. Hubbard for deposition to give testimony to end this ruse. Vaughn Young knew that Mr. Hubbard was not in communication with the Church during the time that ploy was being pursued. Vaughn Young also knew this litigation tactic, and his knowledge of it is evident in this case. It is precisely what is happening here, except Young's false claims of managing agent of the Church status are directed at me.

51. I am not L. Ron Hubbard, nor am I in seclusion. I am visible and I testify. Most of all, as set forth in detail above, I am not CSI's managing agent, and Vaughn Young's attempt to characterize me as such collapses from the weight of his ignorance of the corporate, tax, legal and financial structures of RTC, CSI, and every other Church related organization. Ironically, this tired litigation tactic was finally put to rest with respect to L. Ron Hubbard hours before his death on January 24, 1986, when Judge Mariana R. Pfaelzer definitively ruled that L. Ron Hubbard was not the managing agent of any church. A copy of that order is annexed as Exhibit A.

52. Next, I was subjected to a two and a half year criminal investigation by the Internal Revenue Service. Ironically, the very people I had kicked out of the GO exploited the government's concern over acts the GO had committed to make me the target of an investigation based on the very acts they had committed. Of course they didn't make their previous associations with the GO known. In fact, the IRS's Criminal Investigation Division ("CID") was based on specious allegations filed in civil litigation and spread in the media. The thrust of the investigation was an alleged criminal conspiracy begun in 1966 to impede the Internal Revenue Service. I was the primary target of this investigation even though I was only six years old when I began the "conspiracy."

53. The CID's massive investigation was ultimately rejected outright by the Justice Department. However, the IRS dossier on me, an accumulation of over 100,000 pages of documents -- the largest in the Service's history -- was filled with falsehoods from a handful of bitter former Scientologists and ex-GO like Mr. Young. It contained the same allegations that have been repeatedly disproved, but which are nevertheless being made again in this case.

54. For example, Mr. Young repeats the allegations made by Gerry Armstrong that the Church practices "Fair Game" and that Gerry Armstrong was in "fear of his life." To bolster the validity of this allegation, Vaughn Young refers to the Breckenridge decision. What Mr. Young fails to disclose, however, is the fact that following that opinion, Armstrong was proven a liar. In a police-sanctioned investigation, Gerry

Armstrong was captured on video tape acknowledging his real motives, namely a plot to overthrow the Church leadership and gain control of the Church. On those very video tapes, Armstrong acknowledges he not only isn't "afraid," but that he "will bring the Church to its knees." While plotting his overthrow attempt he gives advice that the Church should be accused of various criminal acts. When told no evidence exists to support such "charges," he responds, "just allege it." It should be noted that while Gerry Armstrong had been an "informant" during the IRS criminal investigation, based on these tapes and statements, the IRS dropped him as a witness, thereby repudiating his credibility. Vaughn and Stacy Young were fully aware of these facts as Stacy wrote the cover story in Freedom Magazine that exposed Armstrong's plot.

55. The steady barrage of such falsehoods poisoned the IRS with respect to the Church generally and me personally. Years later, IRS Internal Security agent Keith Kuhn filed a declaration in several cases, falsely accusing me of threatening another IRS agent with whom I had never spoken in my life. That declaration was stricken as unsupported and scurrilous, and the IRS was ordered by Judge Keller of this Court to pay sanctions for having filed it at all. [Ex. B, Order and transcript, Church of Scientology of California v. IRS, No. CV 90-5638 WDK (C.D.Cal.)]

56. The attempts to harass me in litigation have extended to creating not just false allegations, but false documents as well. In 1984, a former staff member, who was employed by a splinter group that was seeking to pull Scientologists away from the Church for the splinter group's profit, created a forged

document entitled SMASH THE SQUIRRELS which was allegedly written by me and which purported to show that I intended some form of harassment towards apostates of Scientology. One would normally ignore such wild incidents, except this document was continuously used against me in litigation, most particularly to prevent me from gaining access to government files on me. I have had to fight this issue for years and only last year was this matter put to rest. This document was recently examined in a Freedom of Information Act case, Miscavige v. IRS, No. CV 88-7341 TJH (C.D.Cal.) by Special Master Jack Tenner, who found that it was, in fact, a forgery and could not be used in court. That decision was affirmed by Judge Hatter of this Court. [Ex. D, Order of Judge Hatter.] Even though this document has been ruled to be a forgery, Geertz's attorneys have now referred to it and seek to use it in this case as if it were real.

57. Perhaps the most telling indication that the allegations made by Mr. Young and other apostates regarding corporate and financial affairs of various Church entities are false, is the recent recognition of the tax exempt status of all Scientology Churches in the United States by the IRS. This recognition of exemption followed the most exhaustive review of financial records and corporate structure of any exemption application ever filed. That process is described in detail in the accompanying declaration of Monique E. Yingling. [Ex. C.] As part of the exemption process, the IRS also considered and rejected virtually all of the same allegations that are now being made against me in this case. These discredited and untrue charges should not have to be dealt with time and time again. After the most extensive

review in IRS history, to have uninformed apostates second-guessing the IRS's determination, and regurgitating false claims that the IRS and Courts have rejected again and again, putting me in the position of defending against the same old allegations, is ludicrous! This has to end somewhere, as it is not just wasting my time, but the Court's time as well. All the while further false accusations are made that the Church likes litigation. Magistrate Tassopulos stated on January 4, 1994, "You know you people enjoy the fight..." To the degree this statement is directed at me, she is just wrong. I despise litigation and in fact know of no Scientologist who enjoys it. However, we have been forced to defend ourselves because of unfounded allegations the courts seem too willing to accept or which they are incapable of preventing.

THE YOUNGS' LACK OF KNOWLEDGE OF SCIENTOLOGY CORPORATE MATTERS

58. Putting aside Mr. Young's familiarity with the tactic of maligning the Church and me as a litigation weapon, I simply do not understand from where Mr. Young purports to derive his self-proclaimed "expertise" about Scientology as a religion, or about the corporate, legal, or financial affairs of RTC, CSI, or any other Scientology organization. I know Mr. Young, having worked with him briefly on specific projects in 1981 and 1983, and once held him in some personal regard. He never occupied any position of corporate or ecclesiastical authority in any Church or in ASI, and certainly did not have any significant personal exposure to how the corporate or ecclesiastical structure of Scientology is established or how it works. He cannot claim any

personal knowledge in that regard since July of 1989. At no time did he occupy any "inner circle" in Scientology leadership and, in candor, he was never in any position to have any knowledge of what I do or how I do it. To that I must add that despite his outrageous claim to the contrary, I never in my life laid a finger on Vaughn Young, let alone beat him unconscious or otherwise, as he claims. Indeed, this allegation only surfaced once he attempted to enmesh me in this case. It is absurd on its face for Mr. Young to have omitted this alleged incident from his earlier affidavits which purportedly cited the reasons "why he left the church." In my mind, his need to invent complete lies such as this reveal that his motives are personal, his character is spiteful, his aim is money, and his means to those ends know virtually no limits.

59. Vaughn Young completely misstates my relationship to the plaintiff Church of Scientology International. Young claims that I somehow direct, manage and control every facet of CSI's operations and activities. This also is ludicrous. CSI has well over a thousand staff members who deal with international promotion and dissemination efforts, evaluate situations in Scientology churches around the world, and provide plans and programs that give guidance to these churches. This is the activity of international and middle management of CSI, which has an entirely different purpose and sphere of activity than RTC. My job as Chairman of the Board involves many functions, but does not include management of CSI or any other Scientology church. I do not create corporate strategy nor do I direct or manage the personnel of CSI. I do not remove CSI's directors or officers. I

do not run CSI or its executives. Anyone who would testify to the contrary is either uninformed or untrustworthy.

60. The Youngs have chosen not only to malign me personally, but also to attack the very religious beliefs and practices which they once professed to follow. Although the religious nature of Scientology has been recognized by courts and administrative bodies throughout the world for decades, the defendants and their witnesses are attempting to enter the constitutionally forbidden area of judicial evaluations of religious tenets by placing the meaning and efficacy of religious beliefs and practices of Scientology on trial. Deliberately distorted interpretations of Scientology religious doctrine have been filed in this Court concerning Scientology concepts such as PTS Type 3 and Black Dianetics. At the same time, defendant Steven Fishman has also invented entirely fictitious terms such as "EOC," and claimed that they are part of Scientology. They are not. His claim that there is anything in the Scientology religion that even resembles a directive to commit murder or suicide is as outrageous as it is ridiculous. These are all total misrepresentations of religious doctrine made by people who are not in the least qualified to make doctrinal judgments. I can say categorically that "EOC" does not exist in Scientology, and the concept ascribed to it in this case by the defendants is false and scandalous.

61. Young tries to gain credibility by stating he was one of maybe ten people summoned to Mr. Hubbard's ranch when he passed away. He was not the first to be called, but arrived with a cook, a carpenter, gardeners, and a guard. More importantly,

the press on LRH's passing away was not handled from the ranch. Vaughn Young was at the ranch to deal with any local inquiries and with the neighbors and farmhands who had been friends of Mr. Hubbard, and he worked under the guidance of another ASI staff member.

62. Young also mentions Pat Broeker, and attempts to position Broeker as someone who had power and legitimacy within the Church structure. Young, who never held a senior management position during the entirety of his time in the Church, falsely claims that there was a power struggle between Broeker and me after the death of L. Ron Hubbard. This assertion demonstrates Young's lack of knowledge of the actual corporate structure of the Church. Pat Broeker was neither an officer nor a director nor a trustee of Religious Technology Center, CSI or any other Church corporation. It was only an ignorant and destructive few, such as Vaughn Young and Vicki Aznaran, who ever believed or supported Broeker's claims to authority. No removal of Pat Broeker occurred or was necessary. He simply did not hold any position in any Church corporation. Vicki Aznaran, on the other hand, was removed from her position as President and Inspector General of RTC. She herself has testified to the reasons for her removal -- employing an ex-GO staff member involved in criminal acts and allowing false Church scriptures to be presented as authentic writings of Mr. Hubbard, when she knew they were not.

63. All of the foregoing should be viewed in the context of Scientology being a new, evolving religion. Although unfortunate, all emerging religions in history have gone through a period of turmoil, especially following the death of its

Founder. Scientology is no exception. However, we have entered into an extended period of calm and expansion since these upheavals in the 1980s. The resolution of the long-standing conflict with the IRS is perhaps the best indicator of this.

"OF AND CONCERNING" CSI

64. The only issue mentioned by the defendants in connection with taking my deposition which is even arguably relevant to this case is the so-called "of and concerning" issue. That can be disposed of in a few sentences. When a person makes a statement about "Scientology" or the "Church of Scientology," the most reasonable conclusion is that the reference is to CSI. CSI is the Church corporation that is viewed as "Scientology" by the public at large. Major Scientology publications found in public bookstores regularly contain introductory remarks from CSI. For example, the book What is Scientology?, which has just recently been distributed in paperback around the country, has an introduction from CSI. Freedom Magazine, which Stacy Young tried to sever from the Church, proudly states that it is published by CSI. Likewise, when a Scientology spokesman is wanted by the media for virtually anything about "Scientology" or the "Church," they routinely contact CSI. When the IRS recognized CSI as tax exempt and established a group exemption so that new churches could immediately become tax exempt on the authority of the Mother Church, it was CSI to whom the group exemption authority was given. It certainly is reasonable for the public to understand statements about "Scientology" and the "Church" as referring to CSI.

CONCLUSION

65. The thrust of the declarations filed by Vaughn and Stacy Young is that the allegations made by Fishman should be believed. This is remarkable in itself since the Youngs have apparently never met him and never knew him. They appear completely willing to accept this convicted felon at face value, although he served a prison sentence for obstructing an FBI investigation of his financial scam, by telling the same lies about the Church that he is telling this Court. The Youngs devote pages to descriptions of a "Fair Game" policy that no longer exists. Yet they are silent as to their own experiences between the time they left the Church in 1989 and the time they began their careers as paid for hire witnesses. What did happen after they left the Church? There was no harassment. They were free to leave, which they did. We got on with our lives and paid them no attention. Now, nearly five years later, they have resurfaced, making outrageous accusations and participating in an effort to resurrect in this case the tactics of the GO of which Vaughn Young was once a part. The conclusion that necessarily flows from those facts is that the only reason that the Youngs feel safe enough to make their outrageously false allegations of bad conduct and harassment against the Church and me is because they know there will be no "Fair Game" retaliation, thanks to my kicking out the GO and putting a permanent end to their abuses.

66. Since 1981, I have heard this allegation of Fair Game literally thousands of times. Yet, I had never even heard the term until I saw it used in civil litigation, and to this day have never once heard the term used within the Church. Nor have

I ever heard, even from civil litigants, anything actually done to them. Its use is strictly as a smear tactic when one has no act to point to. Vaughn and Stacy Young know the trick and since they know the truth about the use of this tactic against Scientology, I find their declarations particularly disingenuous.

67. The foregoing represents what testimony I believe I had to give in this case had Geertz's counsel not refused to take the deposition of me that he persuaded the Magistrate Judge to order. The essence of the matter is this -- I do not know Fishman and I do not know Geertz, and as to my knowledge of either of them, either before or after the Time magazine article, it is nil. Having no basis to seek my testimony in this case, Geertz's counsel resurrected the same tactics that adversaries have employed for years in litigation involving the Church, namely the employment of hired guns like Vaughn and Stacy Young, to make allegations about matters of which they know nothing. Unlike the Youngs, I know the facts about the matters they address. Unlike the Youngs, I was there. Their self-proclaimed and completely non-existent "expertise" is a disingenuous litigation tactic in pursuit of harassment, and that "expertise" is shown to be fiction crafted for hire and evidence of nothing. The GO was disbanded with finality and the criminals within were forever banished. The IRS attacks were brought to a conclusion with finality. I did those things; the Youngs did not. I know those facts; the Youngs do not. The Youngs present nothing but dusted-off, discredited allegations that cannot withstand scrutiny. I have provided the Court with an accurate, first-hand account of the facts.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 6th day of February 1994, at Riverside County, California.

DAVID MISCAVIGE

'THE FUGITIVE': STALKING HARRISON FORD

PREMIERE

THE MOVIE MAGAZINE

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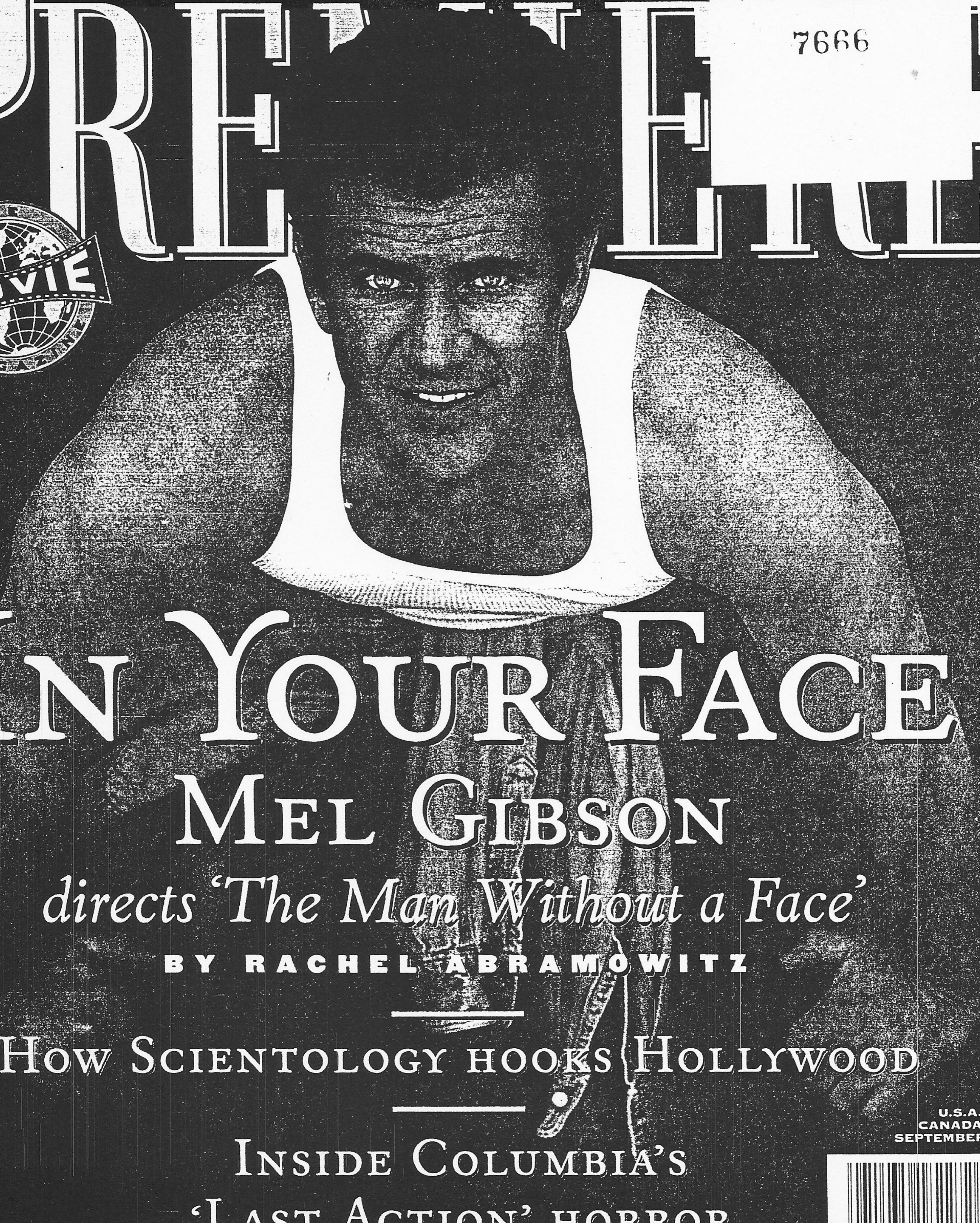

IN YOUR FACE

MEL GIBSON

directs 'The Man Without a Face'

BY RACHEL ABRAMOWITZ

HOW SCIENTOLOGY HOOKS HOLLYWOOD

INSIDE COLUMBIA'S 'LAST ACTION' HORROR

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SEPTEMBER 1993

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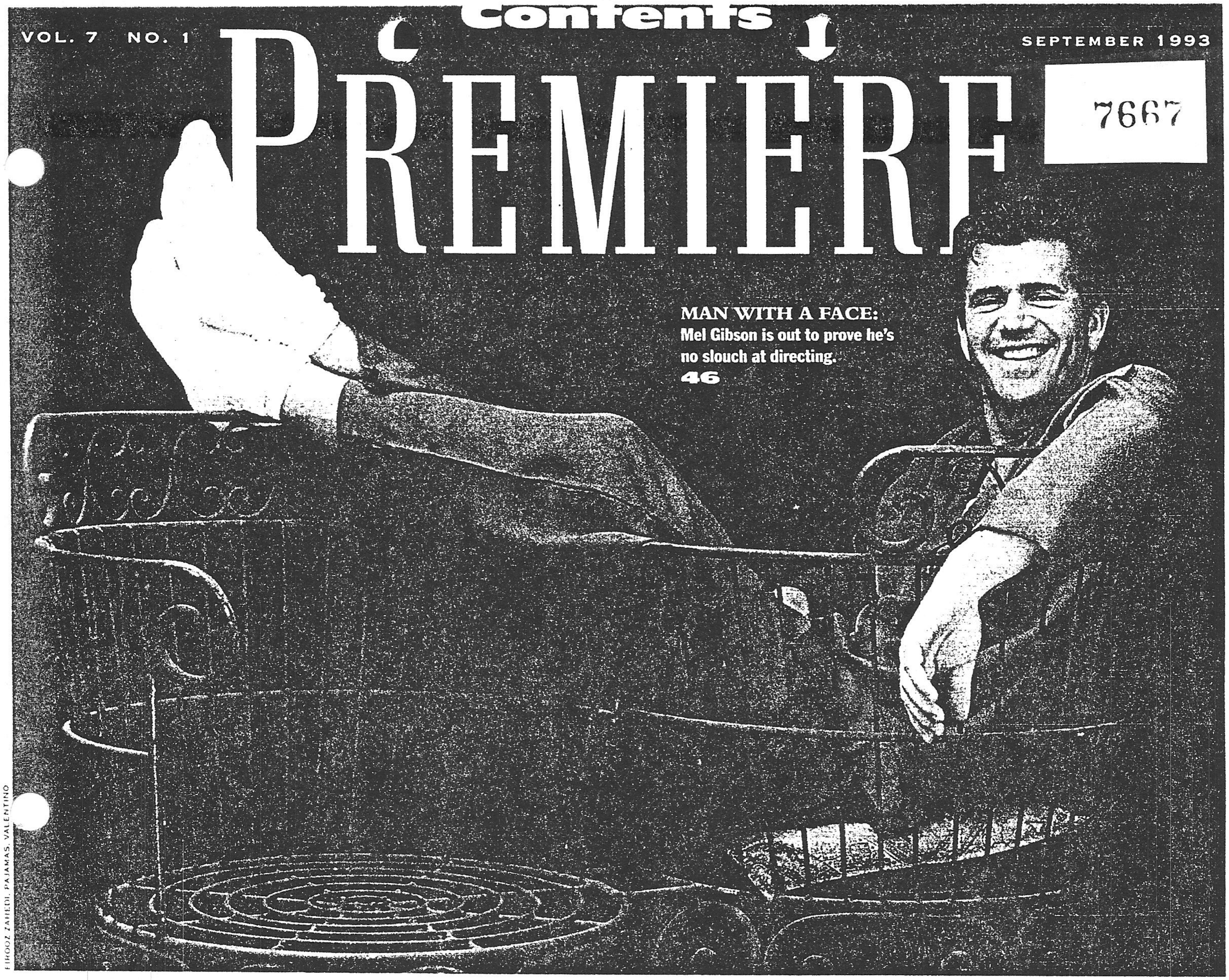

MAN WITH A FACE:
Mel Gibson is out to prove he's no slouch at directing.
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FIROOZ ZAHEDI. PAJAMAS, VALENTINO

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MAD MEL

BY RACHEL ABRAMOWITZ

Directing and starring in your first film can make anybody crazy, especially Mel Gibson—who is not exactly Mr. Introspection, yet still had to tunnel into his childhood to make ***The Man Without a Face.*** "I was trying to throw in a little from what I remember of being that age," says Mel.

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HOW THEY BUILT THE BOMB

BY NANCY GRIFFIN AND CORIE BROWN

In the bunker with Arnold, Mark Canton, and John McTiernan as Columbia tried to salvage ***Last Action Hero.*** "In hindsight," says Arnold, "it would've been better to postpone the opening."

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SISTER ACT

BY JOHN CLARK

PHOTOGRAPHED BY FIROOZ ZAHEDI

Patricia Arquette inflicts some Quentin Tarantino–style ultraviolence on the bad guys in Tony Scott's *True Romance.*

66

BORN TO RUN

BY KITTY BOWE HEARTY

If Clint Eastwood can keep up with a presidential motorcade, Harrison Ford shouldn't have too much trouble outrunning Tommy Lee Jones in this big-budget, big-screen, big-bang rendition of that golden oldie, ***The Fugitive.***

72

ELEPHANTS IN THE GARDEN

BY ESTHER FREUD

When you cross *Edward Scissorhands*' writer with the director of *Europa Europa* to adapt a kids' classic like ***The Secret Garden,*** you get a hybrid that might have surprised Frances Hodgson Burnett.

78

LEADER OF THE (PADDY) PACK

BY JOHN CLARK

Gabriel Byrne has a tough time getting his wife, Ellen Barkin, to pass the salt, but he's not having too much trouble with his acting career. "Who knows?" he says. "One of these movies could take off . . . and I'd be the next Julia Roberts."

80

CAUSE WITHOUT A REBEL

BY PAUL ALEXANDER

James Dean may never come back to the five-and-dime, but his spirit draws 30,000 die-hard fans to the annual James Dean festival in Fairmount, Indiana.

84

CATCH A RISING STAR

BY JOHN H. RICHARDSON

For nearly 40 years, **Scientology** has cultivated Hollywood celebrities—and Tom Cruise now heads a long roster of satisfied show-biz converts. But get between the church and its stars, and you may find yourself shunned by your family, investigated by private detectives—or even accused of being an accomplice to murder.

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THE BLUE SCREEN

BY JOHN H. RICHARDSON

In chapter eight of our serialized fiction, a little too much whiskey and a hidden secret land Peter James on the unemployment line as Detective Grimm's words continue to ring in his ears: "Do you even know, James? Do you know what you've gotten into?"

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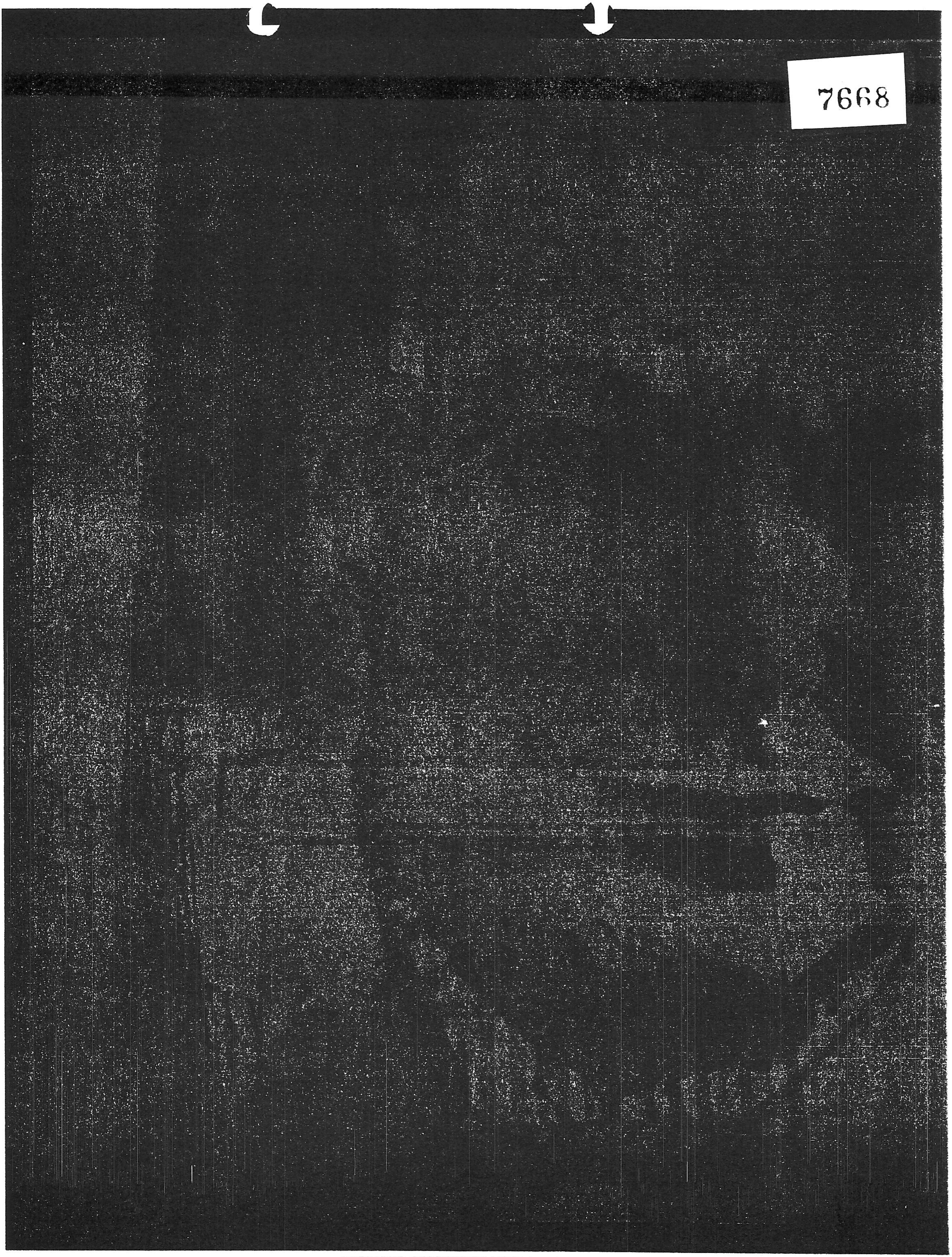

SHOOTING STAR; HUBBARD PHOTO, AP/WIDE WORLD

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CATCH A RISING STAR

Scientology's membership boasts some of Hollywood's top talent, despite one of the most sinister reputations of any modern religion

BY JOHN H. RICHARDSON

PHOTO-ILLUSTRATIONS BY JAMES FEE

> **"The evidence portrays [L. Ron Hubbard] as . . . virtually a pathological liar when it comes to his history, background, and achievements. The writings and documents in evidence . . . reflect his egoism, greed, avarice, lust for power, vindictiveness, and aggressiveness against persons perceived by him to be disloyal or hostile."**
>
> **—Paul G. Breckenridge, Jr., Judge of the Superior Court of Los Angeles, June 20, 1984**

AFTER HIS WEDDING TO NICOLE KIDMAN, TOM CRUISE was the guest of honor at a dinner party given by the powerful Creative Artists Agency at the trendy DC3 Restaurant, overlooking the Santa Monica Airport. Cruise sat at a table with CAA kingpin Michael Ovitz, often called the most powerful man in Hollywood. Right next to them sat David Miscavige, often called the most powerful man in the Church of Scientology, the self-help religion that promises "auditing" will "clear" its followers of the fears and traumas blocking them from total success—at a typical cost of $300 to $400 an hour. Nearby were two full tables of Scientologists. According to one of the guests, the Scientologists around Cruise were "like they always are—very direct, very attentive, very protective—hovering over Tom. And shaking a lot of hands."

Across town, a former Scientologist named Nan Herst Bowers was agonizing over a letter she'd recently received from her 23-year-old son, Todd. "Dear Mom," he wrote, "I am sending you this letter to let you know that I have to disconnect from you. . . . I can't see you, the babies, or Jim until this is all over and handled."

A Hollywood publicist, Bowers had been a Scientologist for twenty years, had been married to a Scientologist, and had raised three sons in the organization. Although she had been drifting away for years, she was still officially a member when an article appeared in the *Star* about Cruise's involvement with Scientology. Almost immediately, the tabloid began getting strange calls. The callers "started harassing me to find out who my source was," says Janet Charlton, the reporter who broke the story. "People in the [Tarrytown,] New York office, the reporter who worked with me, the front office all got fake calls, trying to find out my source, to get a phone number." When that didn't work, Charlton says, she got a startling call from the phone company. "They told me there were people calling from different places, from New York and the West Coast, trying to get copies of my phone bill, pretending to be me. Then someone called *me* pretending to be a lawyer from my own magazine."

Shortly afterward, Bowers says, she also got a strange call—from a man claiming to work for the *Star.* "He said his name was Alan Goldman and he was with the GP Group, which had recently bought the *Star* and the *National Enquirer.* He said he had talked to Janet Charlton, and she said I was her source for the Tom Cruise story, and if it wasn't true, she would be fired."

Bowers insists she wasn't a source for the Cruise story. But Charlton is a close friend. So, Bowers says, under pressure from "Goldman," she finally made the statement that tore apart her family. "I lied for Janet," says Bowers. "He said, 'Did you get paid for it?' and I named a figure I thought was right."

It turned out that "Alan Goldman" was lying. In fact, as Scientology officials readily admit, the caller was a private detective working for Scientology attorneys. Three days later, Bowers says, a Scientology official named Philip Jepsen paid her a visit. "He comes with two people in uniforms—very intimidating—and he asks me about Tom Cruise," Bowers r lls. "It became obvious he knew everything I had told 'Goldman.' He g d me for two hours. At the end, he handed me a Declare."

The charges listed in Bowers's "Suppressive Person Declare"—essentially an order of excommunication—included "writing anti-Scientology letters to the press or giving anti-Scientology or anti-Scientologist data to the press" and "engaging in malicious rumour-mongering to destroy the authority or repute of higher officers or the leading names of Scientology." The Declare meant that, in general, no one in Scientology should speak to her again, including members of her family. It was followed by "Disconnect" letters from her sons and ex-husband.

When Bowers tried to contact her sons, she got letters back from Jepsen. "Dear Nan, I just received a letter from Todd, enclosing a card you sent to him for Valentine's Day," Jepsen wrote. "In the card you suggest to him that you and Todd see each other without telling anyone. I think you realize that this would not help Todd in any way in his auditing, and he would at best have a withhold that would keep him constantly out of session and unable to make any gains. Todd has asked me to let you know that he is now engaged and that he is giving you a year's warning in which to handle your situation so that you will not miss out on something you really want to be part of." In other words, recant or miss your son's wedding.

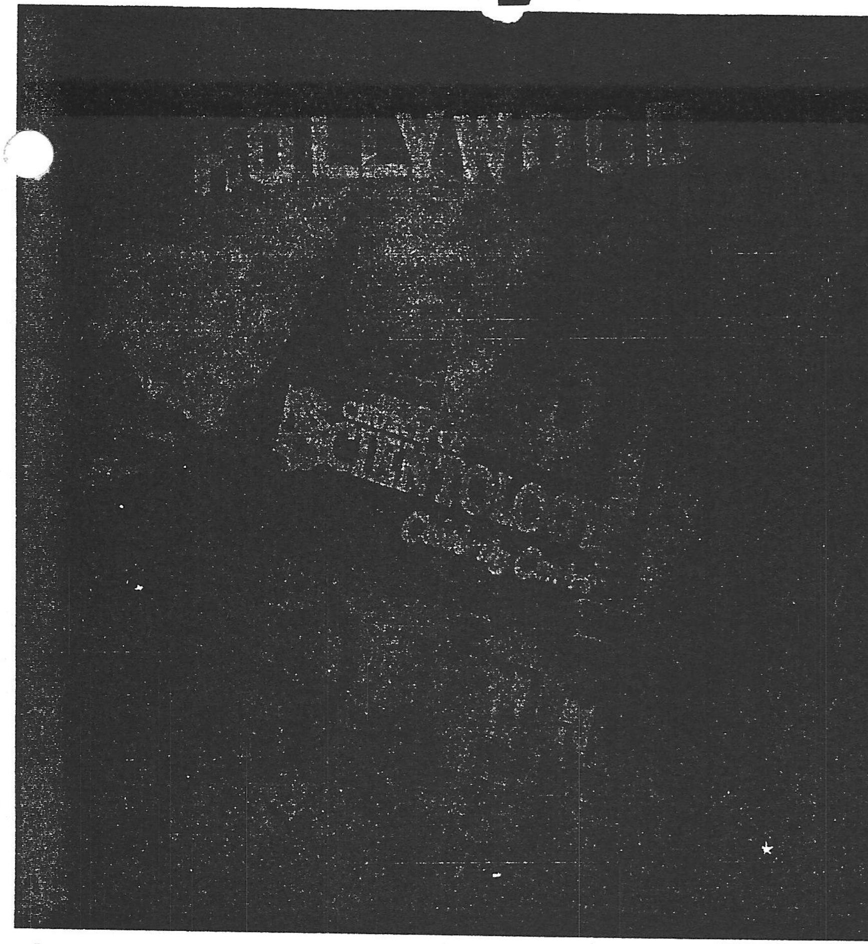
Scientology officials respond to Bowers's charges by accusing her of being in league with the Cult Awareness Network, an anticult group whose members they call "thugs" and "kidnappers." Scientology organizations and individuals have lodged more than 40 lawsuits against CAN, which counts among its members the wife of Supreme Court justice Clarence Thomas and Patricia Ryan, whose father, Representative Leo J. Ryan, was killed by Jim Jones's followers in Guyana. CAN officials say their only service is to provide information, and they adamantly deny Scientology's charges that they are involved in kidnapping or any other illegal acts. Scientologists also say Bowers tried to get one of her sons "kidnapped" by deprogrammers. Bowers admits trying to get her son to talk to two "exit counselors"—who say they don't use force and only talk to people who are willing to speak to them—but the son ran away before she could even bring them together.

Since her Declare, Bowers has been trying to contact Cruise. He has a reputation for being a good guy, she says—surely he wouldn't want her family split up on his account. Maybe he would intervene. "I sent a letter to his assistant," she says. "I said, 'Listen, Tom, the church went out of its way to protect you, and in doing so they ruined my relationship with my three boys. I wanted to know if you could help.' "

Bowers never heard back.

CELEBRITIES HAVE BEEN PART OF SCIENTOLOGY FOUNDER L. Ron Hubbard's strategy for success since 1955, when he launched "Project Celebrity" by printing a wish list that included Orson Welles, Danny Kaye, James Stewart, Greta Garbo, Walt Disney, Darryl F. Zanuck, Cecil B. DeMille, and many others. Scientology's *Ability* magazine printed detailed instructions for hunting them down. "If you want one of these, write us at once, giving the ONE celebrity you have selected. We will then allocate this person to you as your game. Having been awarded one of these celebrities, it will be up to you to learn what you can about your quarry and then put yourself at every hand across his or her path. . . ." The order concluded: "These celebrities are well guarded, well barricaded, overworked, aloof quarry. If you bring one of them home, you will get a small plaque as a reward."

Nearly 40 years later, Scientology has arrived in Hollywood in a big way. The list of celebrity Scientologists now includes Cruise, Kidman,



"THE PURPOSE OF CELEBRITY CENTRE IS TO: FORWARD THE EXPANSION AND POPULARIZATION OF SCIENTOLOGY THROUGH THE ARTS."

—L. RON HUBBARD

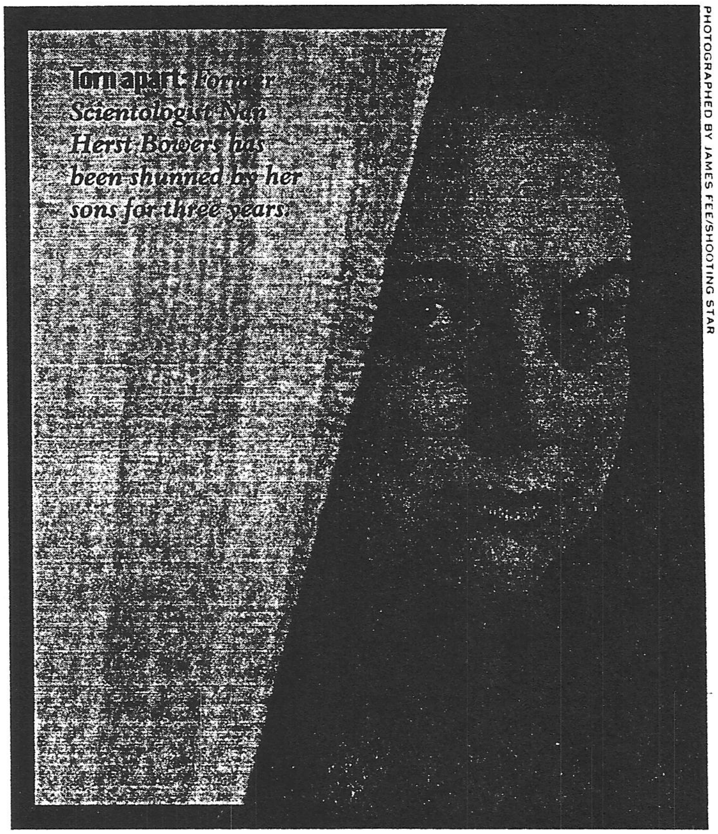
scilla Presley, Lisa Marie Presley, Anne Archer, Juliette Lewis, Kelly Preston, John Travolta, Mimi Rogers, Karen Black, and Kirstie Alley. There are dozens of lesser-known Scientologists in show biz as well: Lee Purcell (*Big Wednesday*), Jeff Pomerantz (*General Hospital*), Geoffrey Lewis (Juliette's dad, who was in *Every Which Way but Loose,* among other movies), Judy Norton-Taylor (*The Waltons*), Nancy Cartwright (the voice of Bart Simpson), child TV actor Vonni Ribisi (*My Two Dads*), Michael Wiseman (*Predator 2*), Kimberley Kates (*Bill & Ted's Excellent Adventure*), Michael D. Roberts (*Rain Man*), and Gary Imhoff (the forthcoming *Thumbelina*). Then there are the behind-the-scenes talents: *Dick Tracy* screenwriter Floyd Mutrux; composer Mark Isham (*A River Runs Through It*); actor and acting teacher Manu Tupou (*Hawaii*); and director Dror Soref (*The Seventh Coin*), who cut his teeth on Scientology films and now has a deal at Paramount. Scientology even claims one of Hollywood's most successful acting teachers, Milton Katselas, who heads the Beverly Hills Playhouse. People who have drifted through Scientology include Jerry Seinfeld, Patrick Swayze, *Top Gun* producer Don Simpson, Harvey Haber (brother of CAA cofounder Bill Haber), actor Brad Pitt, and Ernest Lehman, screenwriter of *The Sound of Music.*

Scientology's physical presence in Los Angeles and Hollywood is massive. It owns at least seven large buildings, staffed by 2,500 members, and is associated with a wide array of local organizations—"front groups" to their detractors. Some are directly affiliated with the Church of Scientology, like the Citizens Commission on Human Rights, an antipsychiatry group, and Author Services, which represents Hubbard's books and hires actors like Roddy McDowall and Bruce Boxleitner to read the Scientology founder's books on tape. Others have Scientologists on staff and use Scientology methods: HealthMed Clinic offers a drug treatment developed by Hubbard called the Purification Rund n, the Gentle Birth Center offers a Scientology-compatible quiet ing technique, and the Delphian School and Apple Academy use his "study tech." Then there's the Foundation for Advancements in Science and Education (FASE), which used funds from the U.S. departments of Energy, Education, and Labor—as well as IBM, ARCO, and the National Science Foundation—to produce a PBS motivational math series that featured Arnold Schwarzenegger, Leonard Nimoy, Ted Koppel, and Edward James Olmos. FASE has also promoted Hubbard's Purification Rundown. Some are run by Scientologists and may have no other connection to Church of Scientology activities, such as the Shaw Health Center and *American Premiere* magazine, which is distributed free to all members of the Academy of Motion Picture Arts and Sciences. (For the record, PREMIERE and *American Premiere* were in a trademark litigation several years ago. The dispute was resolved.)

And Scientology's celebrities work for their church. When one stage of a court case in Oregon went against Scientology, Travolta flew up to speak at a news conference. Alley is the international spokesperson for Narconon International, a Scientology-inspired drug rehabilitation program, which she promotes through interviews, speeches, and public appearances. Magazine covers of Cruise, Travolta, Archer, and others are displayed outside one of Scientology's New York centers, along with the slogan: I AM A SCIENTOLOGIST . . . COME IN AND FIND OUT WHY. Travolta's films have been made available for Scientology benefits: *Chains of Gold* premiered—at the Directors Guild—for Scientology's Ability Plus schools. *Look Who's Talking Too* raised a reported $100,000 for Narconon. In 1991 Black lent her name to a benefit for the Gentle Birth Center. Celebrity Scientologists frequently extol the benefits of Scientology courses in *Celebrity* magazine, which is distributed free at Celebrity Centres: "It was just after auditing that I got the role in *Fatal Attraction,*" says Archer. "The tech that has helped me the most in acting has been Mood Drills and TRs," says Alley. "I guess you could say that is my acting technique." Hubbard's name even made the 1975 Oscars, when producer Bert Salzman said in his acceptance speech, "I want to thank . . . [my] dear friend, and [a] wonderful human being, and a man who helped me pull it all together, Mr. L. Ron Hubbard."

While many Scientologists are certainly sincere idealists—even the most bitter ex-Scientologists say there are many fine people in the group—there is no doubt that Scientology has mastered the art of associating with good causes. Case in point: The Earth Communications Office (ECO) is Hollywood's leading environmental group, with a board that has included such luminaries as Schwarzenegger and Michael Keaton—as well as Rogers, Alley, Preston, and Cruise. R. Michael Wisner, a FASE official and administrative director of HealthMed, was also on the board. Alley helped arrange a premiere of *Look Who's Talking* t[illegible]enefit ECO. Scientologist members suggested that Author Services [illegible]elop an environmental booklet for ECO. The booklet, called *Cry Out*, ended with a poem Hubbard had written before he died in 1986.

The association between ECO and its celebrity Scientologists began to backfire: When the Sherman Oaks Elementary School planned a program of skits and songs based on *Cry Out*, complaints from worried parents and administrators about the Scientology connection became so strong that the school canceled the event. Soon afterward, ECO founder Bonnie Reiss brought up her growing concerns with ECO's Scientologists, at which point Cruise and Alley left. But before they did, Alley appeared under ECO auspices on *The Arsenio Hall Show* with fellow Scientologist Edgar Winter, who performed Hubbard's *Cry Out* for an audience of millions.


Torn apart: *Former Scientologist Nan Herst Bowers has been shunned by her sons for three years.*

PHOTOGRAPHED BY JAMES FEE/SHOOTING STAR

Since he went public, Cruise has been Scientology's most glittering advocate. He says Scientology helped him with his learning disability, and he also reportedly urged studio executives to rent an expensive sound machine developed by Scientologists; it was used on *Far and Away*. (Some associated with the production later noted it did prove useful.) And he has introduced major Hollywood players to church leaders, in one case flying producer [illegible]n Grazer and screenwriter Bob Dolman by helicopter to Scientology's desert complex for a story meeting. Director Ron Howard was waiting there with Cruise. "The surreal thing about it is it's in the desert, and part of the office is built as the replica of a ship," Dolman says. "And the idea of going to a place that has its own compound in the desert and being flown in a helicopter is exotic."

Dolman found his hosts "so security-conscious, so military—there was a car waiting for the helicopter, people wearing brown khakis." At the end of the story meeting, in walked Scientology leader Miscavige to shake hands. Miscavige also came to the *Far and Away* location for Cruise's birthday. "I know he's one of Tom's closest friends," Dolman says.

AT FIRST, NONE OF THE WELL-KNOWN SCIENTOLOGY celebrities would agree to be interviewed for this article. Cruise's publicist, Pat Kingsley, insisted that writing an article about someone's religion was "un-American." Alley faxed this reponse: "If I ever met a journalist who I felt had the intention of representing this religion in its true vein, I would not hesitate to do the interview. My instincts tell me you're not the one. Pass-adena."

Scientology leaders later agreed to a two-day interview with this reporter, which they began by saying they weren't surprised that no Scientology stars would talk to PREMIERE because Cruise's former publicist, Andrea Jaffe, said "you wanted to get some 'juicy stuff' on Scientology." PREMIERE interviewed Jaffe shortly after she left her job with Cruise to become head of marketing at Twentieth Century [illegible]. She denies saying anything like this but admits following up her interview with calls to both Cruise and Scientology spokesman Mike Rinder.

Subsequent to an interview with the Scientology leaders, we received letters from several actors: "Scientology is a brilliant technology that I have used for many years to make my life more insightful and richer," Archer wrote. "As an artist I have felt more and more creative and find myself constantly expanding. Those things that one wishes one could change about oneself just fall away and there you are—more truly yourself."

Priscilla Presley wrote: "Scientology is the only religion I know of that still maintains integrity, values, and delivers what it says it will. I have had tremendous gains from applying Scientology philosophy to my life, and things have changed for the better as a result. . . . People who drop out of Scientology or have a problem with it obviously can't maintain the ethics involved, which is the same reason why our society is in the condition it's in. If we don't have a sense of ethics in our lives and get back to the basics, where is the future for our children?"

Finally, just before this story went to press, actor Michael D. Roberts called and offered—demanded, actually—to be interviewed. "I've had many wins in Scientology, and I've been a member for twenty years," he said. But he insisted on meeting face-to-face and said he wasn't available for "several weeks," repeatedly refusing to be interviewed on the phone right then and there.

Ex-Scientologists were also reluctant to talk—out of fear. "I have kids, I have an ex-husband who is still way, way involved," said one. "Everybody I know has been investigated." A Hollywood publicist also refused: "I don't have the lawyers or the bodyguards." Emilio Estevez was reported to be the target of a Scientology recruitment attempt; he said he supported PREMIERE's efforts but declined to be interviewed: "I just don't want to end up with my phones tapped."

Such fears have considerable foundation. The worst incidents come from the '70s: Scientologists are known to have framed the mayor of Clearwater, Florida, in a trumped-up hit-and-run accident. They also framed a journalist named Paulette Cooper, alleging a bomb threat, and sued her seventeen times. Hubbard's wife, Mary, and ten other leading Scientologists were sentenced in 1982 to five-year terms in federal prison for breaking into government offices and stealing thousands of official documents about Scientology. During their trial, several Scientologists leaked damaging information to the press about the presiding judge's sex life. In a 1977 raid on Scientology's Los Angeles offices, the FBI found lock picks, pistols, ammunition, knockout drops, a blackjack, and bugging and wiretapping equipment, as well as church memos on how to launder money, tail enemies, and blackmail people.

The current leaders of Scientology insist that the acts of Mary Hubbard and her coconspirators represent a dark side of Scientology that is all in the past. They dismantled the unit that was responsible for these activities, and attack a reporter as "a bigot" for raising the issue. But they admit without hesitation that they still use private detectives to investigate their enemies, including Bowers—they even provided documentation of Scientology detectives secretly videotaping a sting operation against a hostile former church member. "I have no problem with that," says Marty Rathbun, president of the church's Religious Technology Center.

To this day, people who tangle with Scientology find themselves subject to aggressive efforts at intimidation. Mike Farrell, who played B.J. on the television series *M*A*S*H*, crossed paths with the church when he contacted the Cult Awareness Network for information on a film project about child abuse. After gaining great respect for their work, he attended a fund-raising event at a private home in Beverly Hills, where he was confronted by angry picketers. "There were people taking photographs, being very obvious, getting video footage of the

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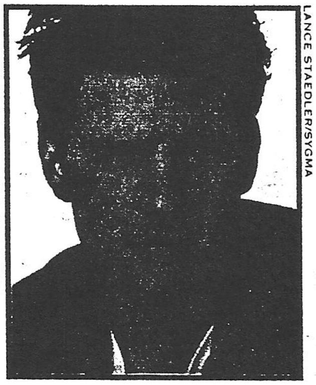
CRUISE CONTROL

Tom Cruise refused an interview with PREMIERE. *When we presented our fact-checking questions, we received this response.*


LANCE STAEDLER/SYGMA

[To the editor:] I got Tom Cruise to answer the questions and I offer them to you on one condition.

The condition is that you use the questions exactly as they were asked and use the answers exactly as they were given.

We have agreed that if any changes are contemplated by PREMIERE we can then withdraw all of the material and nothing can be printed without our specific approval.

With that in mind I send these sheets on to you and would appreciate hearing from you once you have an opportunity to look at them.

Sincerely, Pat Kingsley
[Tom Cruise's Publicist]

1) At a birthday party at DC3 David Miscavige and Paula Wagner sat at Tom's table. Is that true?

I never had a birthday party at DC3. A post-wedding party was given me by CAA, specifically my agent Paula Wagner and Mike Ovitz. Several hundred people were in attendance. At dinner I did sit with David Miscavige, in addition to Paula, Mike and at least 10 other individuals. What's the point?

2) He joined the church via Mimi Rogers. Is that true?

I became a Scientologist while married to Mimi Rogers. No, I didn't join the Church via Mimi or anyone else. My involvement in Scientology at that time was my own as it currently is. The question indicates some built in misunderstanding or intentional misconception as one doesn't "join the Church" as you must already know.

3) Scientologists regularly visit Tom on the set of his movies. Is that true?

No this isn't true. I am occasionally visited on the set by industry people, business associates and people who are all my friends. Some are Scientologists and some aren't. To ask me if I'm visited regularly is like asking a Catholic actor if he is visited regularly by Catholics. However, so as to have no misunderstanding, I assume the question is whether Scientologists who are Church staff or officials regularly visit me. The answer is no. As a matter of fact, during the shooting of my last three films, I was visited a total of one time during the shooting of one of these films by friends of mine who are also church staff. They saw me for about one hour over lunch.

I have heard this allegation before, indicating I have "handlers" and find it repulsive. I wish I could see my friends more often, but they are as busy as I am.

4) That Tom frequently spends weekends at a Scientology retreat at Gilman Hot Springs.

This is false. Although I have been there, I haven't *EVER* spent a "weekend" at the Scientology property (it isn't a "retreat") in Gilman Hot Springs. In the last 2 years or so, I only remember going to the Gilman Hot Springs location once, for a day and a half. And it was even in the middle of the week. My free time, what little I have, is spent with my family at home. And in any event, I have never spent time in any Scientology location for recreational purposes.

5) That his staff have been invited to Scientology offices to take courses.

I have never heard of this and don't even know what it means.

6) His near constant companion is DM.

My near constant companion is my wife, Nic. Dave Miscavige is a good friend of mine and while we both wish we could see each other more often, due to my schedule and his we rarely ever see each other. This question is just off the wall. We are friends. And how is this relevant to anything? It's offensive that I should even have to answer this question.

*7) Nan Herst Bowers—was a Scientologist who was separated from her children by the church. She wrote a letter to Tom saying the church is protecting him from the fact that she "outed" Tom as a Scientologist and that the church broke up her relationship with her children. (Her letter to Tom was asking him to help her.)**

I don't know Ms. Bowers. I have never heard of her. Nor has anyone in my office. I have no idea what this is about except it is bizarre as nobody "outed" me as a Scientologist, and the implication that one would be "outed" as a Scientologist is insulting.

Finally, I have no idea why my religion, or anybody's, would be the subject of an article in PREMIERE and that is why I have refused to participate in any interview. These questions indicate my original feelings about this story were accurate. I have taken the time to answer your questions in such detail, so that there can be no question about their inaccuracies.

I make movies. And when PREMIERE wants to talk about the movies I make, I have been and will continue to be willing to discuss such at length.

But these questions indicate that a reporter is stuck on some preconceived notion as to what Scientology is or how it relates to people's lives. I have gained a lot from Scientology. I know what it is and how it can help people from my own personal involvement and study of the subject. Not one of these questions has anything to do with that. The reporter's angle is clear. The Church of Scientology doesn't run my life or career. By being asked to answer these questions I'm perceived as having to defend my religion or Church and by having to deny accusations a false negative impression is created. This is not what freedom of religion is about. My friends in the church don't regularly visit me on the set. But so what if they did? Years ago, a friend of mine sits at my table at a party and now it's an issue with PREMIERE?

I know the inference as I have seen it in other articles. The problem is it's wrong. This line of questioning shows a lack of interest in learning what the Church of Scientology represents. I know more about Scientology and the Church and its staff than any reporter I've ever met or whose articles I have read. I know the good work they do. I shouldn't be subjected to an inquiry on my religion. Likewise, my Church shouldn't be subjected to press disparagement because I'm a member.

My work speaks for itself. It's on the screen for everyone to see. And as far as PREMIERE is concerned that should be the end of the matter.

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* *Editor's note:* PREMIERE *presented this as an allegation. This question contains factual inaccuracies that have been corrected in the text of the article.*

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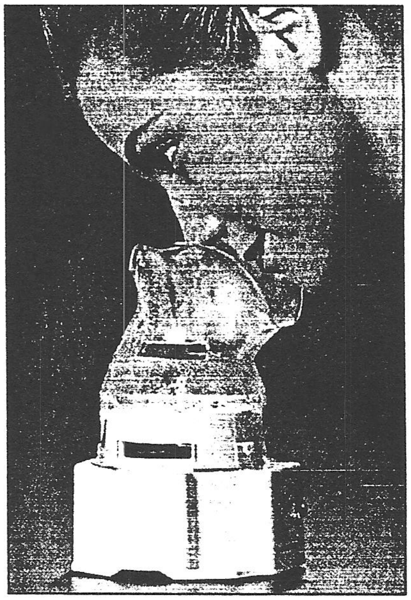

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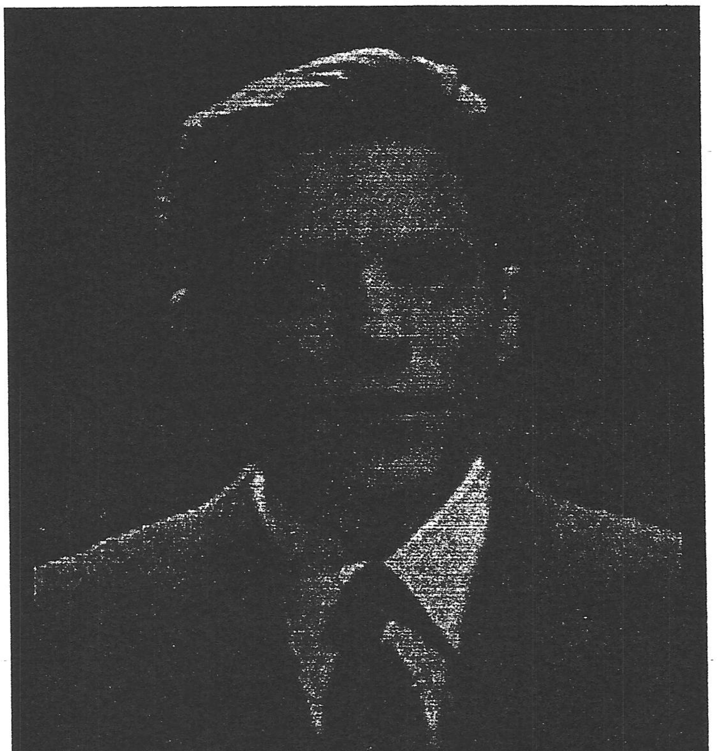
[guests] as they went in and out—obvious harassment," he says.

Farrell says he asked one of the pickets if he was a Scientologist, and the man said yes. In an effort to be fair, Farrell had lunch with Reverend Heber Jentzsch, president of the Church of Scientology International, and investigated Scientology's charges against CAN. The actor says he found them to be based on "sham, invective, and distortion." Later, at a CAN convention near the L.A. airport, Farrell encountered more angry Scientologists. "Not only did they picket, but they sort of get in your face and give you this loud and incessant spiel that doesn't allow for dialogue—it's just a kind of attempt to intimidate."

In the last few months Farrell has gotten numerous strange phone calls, one telling him (falsely, as it turned out) that an old friend had died. There have been so many that now when he gets calls after midnight at his home, he answers, "Hubbard was crazy." Sometimes, he says, there's a long silence before the caller hangs up.



The torch passes: *David Miscavige, whom Tom Cruise describes as "a good friend of mine," is reportedly the successor to Hubbard.*

SCIENTOLOGY'S MEAN STREAK is deeply rooted in church doctrine. Founded by pulp novelist Hubbard in the 1950s, Scientology promises to heal the psychic scars caused by traumas in present or past lives through auditing, a therapy aided by a simplified lie detector called an E-meter. Excited by the rapid progress stimulated by the E-meter, many students eagerly begin the climb "up the bridge," course by course (costs range from $30 for introductory audio tapes to more than $14,000 for the Hubbard to Life/Life Orientation Course special package). According to former members and press reports, the few who attain the highest level of instruction learn the following secret theology: 75 million years ago a tyrant named Xenu imprisoned other aliens near volcanoes on Earth and then nuked them, leaving their spirits, or "thetans," to wander the planet and attach themselves to humans—to be purged through further courses. While Scientology officials dispute this account of their beliefs—spokesman Rinder calls it "garbage, completely untrue"—they refuse to provide a more accurate version, saying upper-level church beliefs are for insiders only.

What distinguishes Scientology is Hubbard's bile and paranoia, which is clearly demonstrated in much of his writing. Representative is this "policy letter" written in 1969: "We must ourselves fight on a basis of total attrition of the enemy. So never get reasonable about him. Just go all the way in and obliterate him." There are many other examples.

Furthermore, one of the central tenets of Scientology philosophy is that 20 percent of mankind is "suppressive," a Scientology term that seems to mean "evil" and "meanspirited." Of that 20 percent, Hubbard wrote, 2.5 percent are "truly dangerous." Such people, Hubbard wrote, "should not have, in any thinking society, any civil rights of any kind. . . ."

As a consequence, Scientologists are always on the lookout for suppressives. "When we trace the cause of a failing business, we will inevitably discover somewhere in its ranks the antisocial personality hard at work," Hubbard wrote—and to Scientologists Hubbard's writings are considered scripture. "Where life has become rough and is failing, a careful review of the area by a trained observer will detect one or more such personalities at work."

As Cruise has told *Entertainment Weekly,* "I look at certain people that aren't doing well and say, 'Well, who's around him? Do they want to see this person do well?' And often I might find one person that really doesn't want to see this guy succeed."

Hubbard left little doubt about how suppressives were to be treated. Consider rule number twelve in Scientology's official code of honor: "Never fear to hurt another in a just cause."

And Scientologists take their code of honor very seriously. "I remember having a choking anger against anyone who ever said anything against Scientology," says actress Diana Canova (*Soap*), a former member. "I would get crazy, I was just so angry. I would have done anything for them."

SOME OF SCIENTOLOGY'S MOST FERVENT EFFORTS seem to go toward preventing—or quashing—bad publicity. In 1990 Universal Pictures made a film with John Candy called *Delirious*, directed by Tom Mankiewicz and produced by Richard Donner, director of the *Lethal Weapon* series. In it, Emma Samms mused to her screen brother about Candy's "strange power" over her. "It's like I don't have a will of my own," she said. "Do you think he's a Scientologist?" the brother asked.

"After the first rough cut Tom and I started getting letters and phone calls," Donner says. "They were saccharine, but there was an underlying threat."

"It was clearly orchestrated," Mankiewicz recalls. "One letter to Dick, cc: Tom Mankiewicz. Then the next day, one to Tom Mankiewicz, cc: Dick Donner. Then two a day. They never stopped; they got worse. The tone got angrier, to the point of 'How would you feel *if he was a Jew?*' "

Donner has a few of the letters still in his files. "You may be aware of some of my books on films and the film industry," one begins, "including *Directing the Film* and *Selling Your Film*. Also, I have been directing my own pictures for twenty years, including the upcoming PBS twelve-part series *Futures* featuring Jaime Escalante. I'm writing to you because I've heard that in your new production, there is a reference to Scientology, my religion, which is derogatory." The letter ends by invoking the names of Scientology celebrities: "I'm sure my colleagues—Kirstie Alley, John Travolta, Milton Katselas, Floyd Mutrux, Anne Archer, Chick Corea, and others—will join me in thanking you for taking this step on behalf of intellectual honesty. Sincerely, Eric Sherman." The other letters are strikingly similar. One from Moe Howard's grandson Jeffrey Scott (who helped develop *Jim Henson's Muppet Babies*) begins with this introduction: "You do not know me directly, but indirectly I am responsible for approving the use of Three Stooges clips in your *Lethal Weapon* series. . . ."

"It finally got to be something really strange—they just wouldn't stop," Mankiewicz says. And when he and Donner ignored the letters, there was concern about a lawsuit. "The lawyer said, 'They have no case, but the chances are fifty-fifty they'll take you to court. How important is this to you?' "

Donner and Mankiewicz still stalled, testing the film, feeling "First Amendment outrage." But gradually things began to escalate, initially with threatening, anonymous phone calls—"then Tom's house was broken into," Donner recalls. "Nothing was taken, but things were moved around, drawers turned upside down. It was, like, 'We can get into your house.' He went to the police, told them about the threats, but there was no way of pinning it down." Mankiewicz refuses to comment about either the threatening phone calls or the break-in, saying there was no evidence to link them to Scientology. But Donner and Mankiewicz decided to lose the gag.

"We all felt a little cheaper for having cut the line," Mankiewicz says now. "It was such an innocuous little joke—a tiny pinprick. God help you if the Catholic church felt like that and you made *Sister Act.*"

The *Delirious* campaign was not an isolated incident. When *L.A. Style* magazine ran a small item listing Scientology's Hollywood Boulevard Christmas display under the heading "Things We Hate," the magazine was the target of regular calls and visits from outraged Scientologists—for the next three months. "It was intimidating," says reporter Richard Natale. And recently, Scientologists picketed outside the Hollywood branch of the Jewish Federation, which runs a cult clinic. The head of the clinic, a woman named Corey Slavin, has been named in nine lawsuits brought by individual Scientologists—and therefore says that, on the advice of her lawyer, she cannot be quoted in this story. (Scientology leaders dismiss Slavin because she is a CAN board member.)

When *Time* magazine's Richard Behar wrote a highly critical story in 1991, calling Scientology the "cult of greed," Scientology sued not only *Time* but seven people who spoke to *Time,* as well as its own (former) PR firm, the company that owns the PR firm, even the CEO of the company that owns the PR firm. When *Reader's Digest* reprinted the article, Scientology sued the *Digest* in five countries. Scientology official Marty Rathbun denounces Behar as "a criminal of the lowest order" for referring people to the "kidnappers" at CAN. *L.A. Times* reporter Robert Welkos says that while he and colleague Joel Sappell were reporting their impressive 1991 series on Scientology, they were the targets of a variety of dirty tricks, including investigations by "three separate teams of private investigators" (Scientologists admit to only one) and a lawsuit for false imprisonment by a church paralegal that was later dropped. Former Scientologist Hana Whitfield wrote a letter to PREMIERE saying that after an interview with this magazine, she'd been followed by private detectives for three months, 24 hours a day. Rathbun and Jentzsch responded by calling Whitfield a CAN operative and an accomplice to a 30-year-old murder, a charge PREMIERE could find absolutely no evidence to support. "It's totally bogus," says Whitfield's lawyer, her voice trembling with outrage. "They know it's false."

> "I'D GET A CHOKING ANGER AGAINST ANYONE WHO SAID ANYTHING AGAINST SCIENTOLOGY. I'D GET CRAZY. I WOULD HAVE DONE ANYTHING FOR THEM."
>
> —DIANA CANOVA

THE ADS APPEAR REGULARLY IN *VARIETY* AND *THE Hollywood Reporter:* "Want to Make It in the Industry? Learn Human Communications Secrets in the Success Through Communications Course." "Can Toxins Destroy Creativity? Attend a Free Lecture." The ads rarely mention Scientology itself, instead steering readers to a place called Celebrity Centre International, a lavish multimillion-dollar training complex on Franklin Avenue in L.A. Restored with 1 million man-hours of labor to a rococo finish heavy on gold leaf and trompe l'oeil paintings, the CC offers elegant suites, luxurious theaters, and state-of-the-art music facilities. Love flows like warm maple syrup the minute a person walks in the door. Life there seems to be much like the CC's elegant restaurant: The food isn't much, but the service is *great.* During her seven years in Scientology, Canova experienced the Celebrity Centre from both sides of fame. "When I started, I wasn't in television I was a nobody—I'd done some TV, but I was not one of the elite, not by a long shot—until I did *Soap.* Then it became . . . I mean, you really are treated like royalty."

Although current Scientology leaders insist the Celebrity Centre is nothing more than a clubhouse cum church for show-biz members, Hubbard himself was more straightforward: "The purpose of Celebrity Centre is to: Forward the expansion and popularization of Scientology through the Arts."

Begun in the late '60s, the Celebrity Centre started in a rented building at 1809 West Eighth Street, with five or six staff members headed up by a charming Australian named Yvonne Gillham. One of the early converts was Bobby Lipton. At the time his sister Peggy was the hot star of *The Mod Squad,* and at the Celebrity Centre he definitely felt "the reflected glory—I was the brother of . . ." To alleviate the expense of taking courses, Lipton says he was pressured to proselytize—including to his sister. "Yeah, they were after her," he says.

Screenwriter-director Ernest Lehman was another early student, drawn to the group after directing Karen Black in *Portnoy's Complaint* and finding himself impressed at how imperturbable she was during tough spots in filming. At that time, the Celebrity Centre "was like the Friars Club, with cocktail parties, art exhibits," he recalls. "If you had nothing to do, you'd drop in. It was more of a social thing than anything else."

Lehman found the Scientologists refreshing. "It was nice being around a lot of people who felt it was bad form to be gloomy and self-absorbed," he recalls. "They were very cheerful, upbeat, which is not something you see much of in the film community."

Screenwriter Floyd Mutrux wandered into the Celebrity Centre in the early '70s after reading Hubbard. "I thought, this guy's writing is terrific, this might be it," Mutrux says. Still a Scientologist, he found auditing immediately useful. "I was able to find things that completely freed me from conceptions and concepts," he says. "I discovered points of view that were completely senior to any that I'd had before and took command."

Mutrux brought in producer Don Simpson. Then writing a screenplay, Simpson plunged into the tech. "I'm chagrined to say I almost went clear—did the E-meter, the whole thing," Simpson says.

Because Scientology helps people overcome doubt and ignore rejection, it is a belief system almost tailor-made for actors. "Before Dianetics [a philosophy of Hubbard's from which Scientology evolved], if people said negative things to me or about me, I would cave in easily," Travolta told *Celebrity* magazine. "Being a man, that wasn't a very appealing quality. Some people would say, 'The boy is too sensitive.' But many times I had suppressive people around me who would cave me in on purpose. I was sort of like a minefield."

By 1974 the Celebrity Centre was a lively concern. Everyone hustled to bring in the famous or the someday-to-be-famous. "A friend of mine I got in was Michael D. Roberts, who was on *Baretta,*" says Ken Rose, who joined the CC staff that year and left in the late '80s. Beyond idealism, there was another strong motive to spread the word: "You get 15 percent of all the money your recruits spend in the church," Rose says. "There's nothing better than a rich selectee."

(Church officials say the maximum commission is 15 percent and is only for the specific course sold. They also say Rose is a CAN member. Since his interview with PREMIERE, Rose has left the country. He was unavailable for comment.)

"There was always pressure to get other celebrities in," agrees Canova. "Once I got a call from this guy at Celebrity Centre at 6 in the morning. He says, 'Diana, you've got to get over here to the hospital, Freddie Prinze has just shot himself.' I used to date Freddie. This guy is freaking out. 'You got to come over, and you got to get me in to see Freddie. If I can get in to see Freddie, I can save his life. I'll tell him to get back into his body.' That was such a weird thing to me, the ultimate dissemination. Wouldn't it have been a coup—Scientology saves Freddie Prinze?"

"When I was a student at the Celebrity Centre," says Lisa Halverson, a former Scientologist who was with the Los Angeles church for fifteen [illegible], "sometimes uniformed personnel would come into the course room and ask us to write down names of what they call in Scientology 'opinion leaders,' heavy hitters of some sort in whatever their sphere of activity might be—in business, politics, and arts and entertainment." It was common knowledge, she said, that the names would be put on a recruitment list.

Canova found the Scientologists straightforward in their desire for lucre. "The first time I walked in those doors, they said, 'Just give us all the money in your bank account. You'll get it back tenfold.' " When she joined, auditing prices were about $25. "It went up to about $175 in the early '80s," she recalls. "That was shocking to me. I was beginning to wonder, Is it really worth it? They're telling you, 'Don't spend $100 an hour on a shrink's couch, it'll ruin your mind.' Auditing is so much better?"

One route to the Celebrity Centre is via acting teacher Milton Katselas. As Archer told *Celebrity* magazine: "I was having problems with my marriage, and my career wasn't going well, so one evening Milton said, 'You have six weeks to solve your problems.' I ended up at Celebrity Centre. I had enormous wins right away from the auditing. I feel my life broke open in the first six hours; it was just remarkable."

Cartwright also credits Katselas with getting her back into Scientology when she drifted away. "One day he invited me to a barbecue at his place, and I noticed that all eight of the people there had things in common," she said in *Celebrity*. "They were all Scientologists. They were all doing well in their careers, they had good relationships, and they all had Milton in common. To make a long story short, I made the decision to get back into Scientology because of these observations. I called up Gary Imhoff and went to the CC Int. I then started the Purification Rundown and my life took off completely."

Actor Peter Horton (*thirtysomething*) didn't respond in quite the same way. For him, Katselas's class "felt very controlling and, I guess, [illegible]," he says. "In an acting class, there's a real tendency to build an image of a teacher as someone who can give them attention and love. So when someone comes along who happens to be a great acting coach—which Milton is; he's phenomenal—but actually has a connection with a system of self-help that verges on a cult, it's very easy for people to be manipulated."

In 1975, the Celebrity Centre landed Travolta, its biggest fish up to that time. "There was tremendous excitement about him," recalls Rose, who says for a time he was Travolta's case supervisor (Scientology officials deny it) and that the star was a jealously guarded church asset. "He's been very disaffected at times, and it took a great deal of work to get him back in," he says. "At one point, it was rumored that J.T. was gone, was no longer a Scientologist, and had made public statements. And then a bunch of people went and held his hand, and evidently he was gotten back in." Travolta seems to be solidly in the church now, having married fellow Scientologist Kelly Preston.

Romance and Scientologists seem to go hand in hand. Prior to marrying Travolta, Preston had lived with Charlie Sheen, reportedly the target of a Scientology recruitment attempt. (Sheen was sufficiently disturbed by his contact with his former girlfriend's religion that he refused an interview with PREMIERE but offered this quote: "I have no involvement in that form of silliness.") Cruise got in after marrying Mimi Rogers, and Brad Pitt took his courses while dating Juliette Lewis. This seems to be something of a tradition. As Rose describes the early Celebrity Centre, there were always "a lot of women around. It was probably a great draw in those days, for my generation of Scientologists—it was a great place to get laid."

Hollywood producer Jim Jacks says one night when he was depressed over the collapse of a relationship, he was approached by a show-biz friend in Scientology. " 'It will solve your woman problem,' " Jacks recalls his friend saying. "I think he was just trying to help, but I wasn't interested."

BREAKING UP WITH SCIENTOLOGY CAN BE VERY HARD TO DO. "It took me years before I decided to quit," says Canova. "I guess finally I was so fed up with being afraid. You've heard all these horror stories . . . I believed them."

"The party was over for me in 1971," Bobby Lipton says. "I remember going to a rally at the Shrine or some big hall, at a time when the press was first starting to get after them, and there were people marching around with banners and signs and screaming about getting the press. It was kind of scary, talking about targeting different people. I thought, gee, this isn't what it was about."

But when he tried to leave soon after, Lipton was accused of telling the secrets of Scientology's upper-level courses to outsiders. "The last thing they said to me is, 'If you did reveal them, you are going to die,' " he recalls. "I don't think they said 'die,' but that's the inference I took. I said, 'Is that a threat?' I think he said, 'Take it any way you want.' "

Simpson says he lost interest after spending $25,000 on Scientology courses without seeing much improvement. "I had a meeting with Yvonne [Gillham], and I said, 'I've now almost gone clear, why aren't I happier?' " he recalls. "She said, 'Things will be okay when you go through OT3 [a higher-level course].' At that point I realized it was a con." But when he left, he took a warning with him. "Heber Jentzsch called me into the Guardian's Office and implied that I was making a grave error," Simpson says. "The implication that I took away was that I would be on their enemies list."

Jentzsch says it is an "absolute lie" that he threatened Simpson in any way and says that Simpson was bounced for ethics violations he could not reveal because of his "privilege as a minister."

THE LEADERS OF SCIENTOLOGY INSIST THAT MUCH of the organization's bad press comes from psychiatrists who are angry that Scientology is encroaching on their turf. They point to their fights against psychiatry and drug abuse as evidence of a beneficent side of the religion that the press ignores. "We're *helping* celebrities," says Jentzsch. "We service them—to be more capable, to be more ethical, to be more able. . . . Scientology celebrities are successful, and they're not messed up! They're not messed up!

"There's a long list of celebrities who have been devastated by psychiatric activities and psychiatric assault," Jentzsch continues, citing the case of Frances Farmer: "Psychiatrists would take her out and use her for big parties, sex parties, and stuff like that."

PREMIERE checked into this: According to William Arnold's heart-wrenching book on Farmer, *Shadowland*, it does seem that *orderlies* at a Seattle mental institution allowed soldiers to have sex with her—but then we noticed that Arnold's list of acknowledgments makes special mention of the emotional and research support he got from Heber Jentzsch and the Citizens Commission on Human Rights. He doesn't mention their connection to Scientology.

But the Scientologists have other good press they can point to. During an interview, they proudly cited this quote Rob Reiner gave to *GQ*: "I don't know anything about Scientology, but if Scientology means you're the way Tom Cruise is, then everyone should be a Scientologist."

Perhaps. Maybe Scientology has emerged from its dark past. But if that's true, then why the use of intimidating private detectives, why the ugly attempts to smear their critics, why the barrage of legal threats, why the badgering by belligerent Scientology officials who fight over the simplest questions? Theirs is a meanspiritedness so pervasive that we finally became convinced that when they can't discourage it altogether, Scientology leaders want bad press, the better to justify their own vindictive gospel.

Now when we call Bowers, we wonder if someone, somewhere, is listening. She has moved to another city, and we worry that her address will slip through our fingers and into the fingers of Scientologists. And we listen to Canova when she warns us: "They're capable of doing a lot of things."

Like many of the people quoted in this article, all of whom are well aware that people who were interviewed by *Time* are currently being sued, Canova says she spoke up because she thought it was important. "I see some of my friends having to keep their mouths shut for personal reasons, for business reasons," she says. "I don't believe that's right. If it's going to be termed a religion, or a church, then those kinds of fears have no business being there. Nobody should be afraid. And you can quote me on that." ■

Senior writer John H. Richardson's novel, The Blue Screen, *which is currently being serialized in* PREMIERE, *will be published by William Morrow in the spring.*

January 21, 1994

Lawrence Wollersheim
121 High Street
Golden, CO 80403

Via Fax (303)271-0863
and mail

Dear Lawrence:

In order to best support FACTNET and its humanitarian goals I am by this letter resigning effective immediately as a Director and as its President.

I wish you and your organization Godspeed.

Yours sincerely,

Gerald Armstrong

Gerry Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450

ORIGINAL

Denied
GWT 4/7/95

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, California 94960
Telephone: 415-456-8450

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. **157 680**

EX PARTE APPLICATION TO **CONTINUE HEARINGS** ON MOTIONS FOR **SUMMARY** ADJUDICATION **OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION** OF 2ND AMENDED COMPLAINT

Date: 4/7/95
Time: 9:30 a.m.
Dept: One
Trial Date: 5/18/95

TO: CHURCH OF SCIENTOLOGY INTERNATIONAL AND ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on April 7, 1995 at 9:00 a.m., in Department 1 of the above-entitled Court, located at the Hall of Justice at the Marin County Civic Center, San Rafael, California, defendant Gerald Armstrong, in pro per, will seek an ex parte order continuing the hearing on plaintiff's motion for summary adjudication of the twentieth cause of action of its complaint presently set for April 21, 1995.

This ex parte application is based upon the following grounds:

A. There are key witnesses, whose testimony is or may be dispositive of the pending motions, or causes of action or parts of these motions, declarations from whom defendant has been unable to obtain, but believes he can obtain such declarations, one of which with the Court's assistance, within the next week;

B. Defendant is in pro per and without financial resources, has attempted diligently to obtain an attorney, and believes that he will be successful within the next week;

C. Defendant is not an attorney, lacks an attorney's knowledge and skills, but has, nevertheless, worked diligently to prepare oppositions to plaintiff's motions.

D. Plaintiff's motions are massive, involve complex legal issues, will set the stage and parameters for trial, and if granted grounds will cripple defendant and destroy his litigant's and human rights.

This ex parte application is based upon this notice, the attached declaration of Gerald Armstrong, the Court's files and records in this case and such other material as is presented in support of this application.

DATED: April 7, 1995

By: ______________________
Gerald Armstrong

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare:

1. I am the defendant in this case. I am not an attorney, not trained as an attorney, and do not have an attorney's knowledge or skills. Until February 23, 1995 I was represented by attorney Ford Greene.

2. On February 27, 1995 I received from plaintiff Scientology organization its motion for summary adjudication of its twentieth cause of action of its complaint. Scientology's motions are massive, involve complex legal issues, will set the stage and parameters for trial, and if granted grounds will cripple me and destroy my litigant's and human rights.

3. On March 10 this Court signed an order, for which I am very grateful, granting an ex parte application which extended by two weeks the time to oppose the above-described motion for summary adjudication.

4. After the Court granted its first extension I was ill for a two-week period. I lost a great deal of strength, was incapacitated and unable to perform my usual work, or to work in any effective way on the oppositions. I am gaining back my strength, although I am not yet back to normal.

5. On March 17 Scientology served on me another motion for summary adjudication, this of the 13th, 16th, 17th and 19th causes of action of the second amended complaint. This motion seeks $200,000.00 in liquidated damages.

6. Scientology's motion for summary adjudication of the 20th cause of action and supporting documents is over six inches thick. The second motion and supporting documents is another two inches.

7. On March 29 this Court signed an order, for which I am also grateful, granting an extension of one week to oppose the two pending motions.

8. I have worked diligently to oppose Scientology's motions. I have a direction for my oppositions which I believe will be adequate and successful. I am not a typist, and Scientology's separate statements of undisputed facts alone required 80 pages. Adding in my separate statements of disputed and undisputed facts brings this part of the work to well over 100 pages. I have done research, and located and communicated with all of the people whose testimony I require by way of declaration to support my oppositions.

9. There remain four individuals from whom I requested declarations, and whose testimony is either dispositive of one or both of the pending motions, or of certain causes of action or parts of the motions, or is an essential support for my defenses to the causes of action, from whom I have been unable to obtain declarations, but from whom I believe I will be able to obtain declarations within the following week. I list these four witnesses below.

10. Michael J. Flynn, Esquire. I have had a series of conversations with Mr. Flynn in the past three days. He has

stated to me that he wants to help me and would provide a declaration in support of my oppositions, except for the fact that he believes if he does so Scientology will sue him and again make him fair game. I am therefore requesting that this Court order that Mr. Flynn be freed from any contract by which Scientology prevents him from providing me a declaration, and that Scientology be ordered to not retaliate against Mr. Flynn in any way as a result of his providing such a declaration.

11. Mr. Flynn will testify that Scientology prior to and during the time he was involved in litigation used the legal system and force against perceived critics and targeted "enemies" to eliminate ideas antithetical to its own, that this went under the heading "fair game," and included the concepts of "attack the attacker," and "black propaganda." He will testify that Scientology swore to give up these practices and begged for a settlement as a means of obtaining an opportunity to prove that it had given up these practices. He will testify that but for Scientology's promise that it was giving up all fair game practices he would never have agreed to sign, nor had me nor any other client agree to sign, Scientology's settlement documents. He will testify that depth of his and my principles and extent of dedication to the truth is manifested by the successful litigation of the case Scientology v. Armstrong, Los Angeles Superior Court No. C 420153. He will testify that intrinsic to the agreement was the recognition that the Armstrong cross-complaint was about

to go to trial and that Scientology had substantial liability, and the recognition that there had been a verdict of $30,000,000 against Scientology in the case of Wollersheim v. Scientology, also in LA Superior Court within less than five months of the December, 1986 settlement. He will testify that he was the subject of fair game from 1979 through 1986, had been sued fifteen times by Scientology, had been harassed unmercifully, framed, threatened, his marriage ruined and his family and career threatened, and that he was desperate to get out of the fair game threat. He will testify that there were no negotiations concerning the liquidated damages condition of the settlement agreement, that there were no negotiations involving me, and that he believed that, despite Scientology's refusal to not include the condition, it was and is unenforceable, and told Armstrong so at the time; that there is no reasonable relationship between Scientology's actual damages and the liquidated damages, and that the bargaining power of the parties was completely lopsided in Scientology's favor. He will testify that there was supposed to be a "clean slate" and that if Scientology published anything about me after the settlement I was free to respond to such post-settlement statements.

12. I am therefore requesting this Court's assistance and an order freeing Mr. Flynn and making it safe for him to provide this key testimony.

13. Lawrence Wollersheim. Scientology seeks an order

which reads in part: "within 20 days of the issuance of this Order, Armstrong shall: 1. Remove all information concerning Scientology, the Church and/or any person or entity referred to in paragraph 1 of the "Mutual Release of All Claims and Settlement Agreement" of December, 1986 from any and all databases, electronic or otherwise, within the possession, custody or control of FACTNet." Mr. Wollersheim is the founder and manager of FACTNet, a cult abuse victims advocacy organization which collects, preserves and makes available information on groups and organizations which employ sophisticated and dangerous techniques of mind control. He will testify that I was not involved in FACTNet's management or operations. He will testify that Scientology is seeking an order allowing the removal and/or seizure of materials from a public library and archive, that the described materials are not those I provided and exceed by hundreds of times whatever I provided to FACTNet, and that they are public domain materials.

14. Mr. Wollersheim has not been available to provide a declaration until recently, and because the order Scientology seeks affects FACTNet, he requires time to obtain the legal opinion of counsel before he can provide the needed declaration, but will be able to do so this weekend.

15. Margery Wakefield. Scientology supports its motions with a ruling in the Wakefield v. Scientology case. Ms. Wakefield will testify as to how Scientology obtained a

settlement agreement with her similar to mine, what her understanding of its meaning was, and circumstances which have brought her, similarly to me, to again be a target of Scientology's fair game. I have only recently located Ms. Wakefield, have drafted a declaration for her and have her promise to get it back to me over this weekend.

16. Witness #4. This person requests to not be identified until a declaration has been provided. This witness has been on a business trip and not available to provide a declaration, but has promised such a declaration by the beginning of next week. This person was key to the actions I have taken which Scientology considers breaches of its settlement agreement and which are the subject of its pending motions. This person will testify as to circumstances which precipitated and excuse my actions.

17. All of the people from whom I still require declarations are out of state. I have only this week been able to obtain a fax machine and that fact delayed my getting drafts to the witnesses and getting declarations back.

18. From the time Mr. Greene substituted out I have attempted to obtain competent counsel to represent me in this litigation. I have now communicated substantively with fifteen attorneys, each of whom has thus far declined to represent me. I have also had communications with two attorneys within the past week who are both interested in my case and are both seriously considering helping in some

manner, if not complete representation. I believe I will be able to get at least one of these attorneys to commit if my request herein is granted. I have also communicated with a number of organizations which have an interest in the First Amendment issues which my case presents and which may be able to assist financially or with creating a public forum for and focus on the case's issues, and this past week a description of my case and needs was posted on the internet. I am confident that help is on its way. An extension of one week will also give me an opportunity have an attorney assist in my oppositions or at least review my work, if I am able to obtain legal help in the next two weeks. These summary adjudication motions are extremely important and will set the stage and guidelines for the May trial. Any attorney who might become involved in my case would want to have as much input as possible into what that stage and guidelines will be.

19. My request for an extension, therefore, is not frivolous, but will promote justice by giving me the chance I need to defend myself. Scientology will not be prejudiced in any way if an extension is granted.

20. I am requesting that the hearing on the motion for summary adjudication be set for April 28, 1995.

21. I advised Scientology attorney, Laurie Bartilson, in person at 11:00 a.m. yesterday that I would seek a continuance of the hearing date ex parte today if she would not agree to such a continuance. I followed this up with a faxed letter, a

copy of which is appended hereto as Exhibit A.

22. I again ask for this Court's patience and mercy.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Anselmo, California, on April 7, 1995.

GERALD ARMSTRONG

ORDER

GOOD CAUSE appearing therefor, it is hereby ORDERED that the hearing on plaintiff's motion for summary adjudication of the twentieth cause of action of the second amended complaint, and the hearing on plaintiff's motion for summary adjudication of the thirteenth, sixteenth, seventeenth and nineteenth causes of action of the second amended complaint shall be continued to 9:00 a.m. April 28, 1995.

IT IS FURTHER ORDERED that defendant's former attorney Michael J. Flynn be released by plaintiff from any contractual condition which prohibits him from providing defendant Gerald Armstrong with a declaration in support of his oppositions to plaintiff's summary adjudication motions, and that plaintiff and its agents shall not retaliate in any way against Mr. Flynn in any way for providing such declaration.

DATED:

____
Judge of the Superior Court

EXHIBIT A

April 6, 1995

Laurie J. Bartilson, Esquire
Moxon & Bartilson
6255 Sunset Boulevard, Suite 2000
Los Angeles, CA 90028

By Fax (213)953-3351

Re: **Scientology v. Armstrong**
Marin County Superior Court
Case No. 157680

Dear Ms. Bartilson:

As we discussed this morning, I need and request another week to file my oppositions to the two pending summary adjudication motions; and as you refused my request I advised you I would seek another extension ex parte tomorrow morning from Judge Thomas.

The reasons I need an extension are:

1. I have not received four needed declarations in support of my oppositions, and cannot get two of them (at least) until early next week.

2. Working as diligently as possible I have not been able to write and/or assemble all the documents needed. As you know I'm not an attorney, and simply don't have an attorney's knowledge or skills; nor the resources and equipment.

3. I have contacted and spoken with a great number of attorneys to obtain representation; and I believe, based on conversations in the past 48 hours, that I will be able to obtain legal help this weekend.

4. As you know, I was ill and incapacitated for the two weeks of the first extension Judge Thomas granted. My strength is not back to normal even yet.

Scientology won't be prejudiced if it grants me another week, which, as I stated, would be the last extension I would request.

In the happy event that you and your client find the kindness in your hearts to grant an extension, I'm also faxing a stipulation for your signature.

Yours faithfully,

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
Phone & Fax (415)456-8450

cc: Michael L. Walton, Esquire (by Fax)
cc: Andrew H. Wilson, Esquire (by Fax)

[redacted] [redacted]

FOR IMMEDIATE RELEASE

7692

Contact: Nancy O'Meara
Church of Scientology
International
213-960-3500

OR: Andrew Wilson
Wilson, Ryan & Campilongo
415-391-3900

JUDGE ORDERS MARIN COUNTY MAN TO PAY CHURCH OF SCIENTOLOGY $100,000 IN DAMAGES

FINES HIM AND HIS LAWYER FOR BAD FAITH TACTICS

Marin County -- Judge Gary Thomas of the Marin County Superior Court ordered Gerald Armstrong of San Anselmo to pay the plaintiff, the Church of Scientology International, $100,000 in damages for breaking provisions of a 1986 settlement agreement he signed with the Church. The ruling, issued Friday, January 27, also sanctioned Armstrong and his lawyer, Ford Greene also of San Anselmo, for engaging in "bad faith" litigation and fined them $700.

This is the latest in a string of legal wins for the Church against Armstrong who has been in and out of court since he stole more than 10,000 documents from the Church in 1982 including over 5,000 papers of Scientology founder L. Ron Hubbard.

In the agreement he signed in 1986 Armstrong promised to refrain from spreading falsehoods about the Church. According to documents filed in this case, Armstrong is accused of having knowingly violated that agreement on a number of occasions as early as 1991. The Church sued in 1992 after Armstrong repeatedly refused to abide by the contract he had signed. Judge Thomas' ruling was based on documents filed in support of the Church's charges and regarded two of the earliest reported breaches by Armstrong.

The Church's lawyers, Andrew Wilson (San Francisco) and Laurie Bartilson (Los Angeles) called the judgement "a complete legal and moral victory. It sends a message that you can't ignore your contractual obligations on a whim and that there's a price to pay for breaking promises. We hope this ruling will give Mr. Armstrong a message he will heed."

Armstrong conceivably faces more extensive liability in this litigation, as the Church has asserted 18 additional claims against him. These, too, arise out of his violations of the 1986 agreement according to the Church's lawsuit. The Church has also charged that Gerald Armstrong fraudulently transferred title of a house he owned in order to manufacture a poverty plea against the judgements now starting to be entered against him.

RECEIVED
JAN 31 1995
HUB LAW OFFICES

Church of Scientology
Office of the President

7693

Ms. Carol Fracassa
Producer
Entertainment Television
5670 Wilshire Blvd.
Los Angeles California 90036
FAX 213 954-2621

August 5, 1993
cc: Tom Searson
News Director

Dear Ms. Fracassa,

In our discussion yesterday you said that Mr. Armstrong had asserted that he had researched Mr. Hubbard's background, and then he had become disenchanted with what he found. I was surprised to hear that Armstrong is still trying to sell this falsehood to the press. You should know that in 1984 when quizzed in open court on his level of research on Mr. Hubbard's Naval records, Armstrong admitted that he had really done no research. When confronted in detail about this obvious egregious omission, his sheepish response was:

" So I stand corrected.."

Armstrong's admission shows that his "research" was unprofessional, and that it was based on bias. Add to this his subsequent bragging about creating and planting forged documents and it becomes obvious that he has no credibility as a source of truthful information concerning the Scientology faith or its founder. The fact that he admitted to you that his purpose in attacking Scientology celebrities is so that he can "sell his story to Hollywood" further makes the entire scenario of his involvement an anathema to honesty, and certainly discredible as a source of any information on any religion.

He has no relation to art or to artists and has no history of being published anywhere - except, of course for the photo of himself, nude, hugging the globe of the world and promoting the idea that everyone should give away what money they have.

The documents are attached.

DEFENDANT'S EXHIBIT
37
7/27/94
FARNY

Sincerely,

Heber C. Jentzsch

Heber C. Jentzsch
President

7694

HUB LAW OFFICES
711 SIR FRANCIS DRAKE BOULEVARD
SAN ANSELMO, CALIFORNIA 94960-1949
(415) 258-0360

FORD GREENE
LAWYER

LICENSE NO. 107601
FACSIMILE (415) 456-5318

February 19, 1992

Laurie J. Bartilson
BOWLES & MOXON
6255 Sunset Boulevard, Suite 2000
Los Angeles, California 90028

By Telecopier

B & M	213-662-6419
MJF	617-720-2709
C & B	818-883-2033
AHW	415-954-0938

RE: *Scientology v. Armstrong*
Marin County Superior Court
Case No. **152229**

Dear Ms. Bartilson:

The Scientology organization has based its complaint and its motion for preliminary injunction against Gerald Armstrong in large part on attorney Lawrence Heller's rendition of the settlement negotiations and interpretation of the settlement agreement. We are aware of the fact that Gerald Armstrong's attorneys, Michael Flynn, Bruce Bunch and Julia Dragojevic are specifically prohibited from giving a declaration to Armstrong which would refute Heller's allegations, as well as those of other organization attorneys.

We therefore request that you release each of Gerald Armstrong's former attorneys from such prohibition so that they can provide him with declarations and assist him in the above-referenced litigation. If we do not receive notice of such release by February 24, 1992, we will ask the Court for a ruling that Heller's and the organization's allegations concerning the settlement agreement are false and that they be stricken.

Sincerely,

FORD GREENE

:acg
cc: Gerald Armstrong
Michael J. Flynn, Esq.
Bruce Bunch, Esq.
Julia Dragojevic, Esq.
Andrew H. Wilson, Esq.

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LAWYER

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February 24, 1992

By Telecopier

LAURIE J. BARTILSON, ESQ.
Bowles & Moxon
6255 Sunset Boulevard, Suite 2000
Los Angeles, California 90028

RE: *Scientology v. Armstrong*
Marin County Superior Court
Case No. **152229**

Dear Ms. Bartilson:

In its motion for preliminary injunction for breach of contract, the Scientology organization cites to and relies on Wakefield v. Church of Scientology of California, claiming that the Wakefield "settlement agreement contain[s] terms substantially similar to those which Armstrong has violated here." The organization moreover claims that "CSC has already successfully obtained injunctions and specific performance of settlement agreements containing similar provisions."

Our research has revealed that none of the "well over a dozen plaintiffs" involved in "the settlement negotiations" (see Heller declaration) was advised that the agreement was not reciprocal; i.e., that the organization could say whatever it wanted about the signing plaintiffs following the settlement but the signing plaintiffs must remain silent. Our research reveals, moreover, that signing plaintiffs were advised, as was Mr. Armstrong, by their attorney, Michael J. Flynn, that the settlement agreements "are not worth the paper they are printed on."

The issues of reciprocality of the settlement conditions and the advise of the "negotiating" attorney that the agreement conditions are unenforceable clearly affect the motion for preliminary injunction, and relate to the good or bad faith in which the motion has been brought.

We are aware of the fact that each of the "well over a dozen plaintiffs" is specifically prohibited from providing Mr. Armstrong with a declaration regarding the settlement agreement, its reciprocality, advice of unenforceability, other facts which would refute Heller's allegations concerning the settlement negotiations and results, and from providing Mr. Armstrong with copies of their "substantially similar" settlement agreements.

We therefore request that you release each of the plaintiffs involved in settlements with your organization from such prohibition so they can provide Mr. Armstrong with declarations and assist him in his defense of your charges. If we do not receive notice of such release by February 26, 1992, we will ask the Court for a ruling that all cites and references to other "substantially similar" settlement agreements be stricken, that the Armstrong settlement agreement was reciprocal, that the organization knew that it was unenforceable, and that Heller's representations to the contrary are false and that they be stricken.

Sincerely,

FORD GREENE

:acg
cc: Gerald Armstrong
Andrew H. Wilson, Esq.
Michael J. Flynn, Esq.
Julia Dragojevic, Esq.
Bruce Bunch, Esq.
Garry P. McMurry, Esq.
Walt Logan, Esq.
Nancy Dincalci
Kima Douglas
Michael Douglas
Robert Dardano
Warren Friske
William Franks
Laurel Sullivan
Edward Walters
Howard Schomer
Martin Samuels
Julie Christopherson
Nancy McLean
John McLean
Tonja Burden
Gabe Cazares
Margery Wakefield

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TIMOTHY BOWLES
ALSO ADMITTED OREGON
KENDRICK L MOXON
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LAURIE J BARTILSON
ALSO ADMITTED MASSACHUSETTS

HELENA M KOBRIN
ALSO ADMITTED FLORIDA
WILLIAM D KATZ

OF COUNSEL
JEANNE M GAVIGAN
MARCELLO M DI MAURO
KAREN L BROWN

7697

RECEIVED
MAR 5 1992
HUB LAW OFFICES

March 2, 1992

BY TELEFAX AND U.S. MAIL

Ford Greene
Hub Law Offices
711 Sir Francis Drake Boulevard
San Anselmo, California 94960-1949

Re: Church of Scientology International v. Armstrong

Dear Mr. Greene:

I have received your letters of February 19 and 24 concerning the above-entitled matter, which purport simultaneously to acknowledge the validity and binding nature of the settlement agreement at issue in this case, and to disregard its provisions in the service of your client, Mr. Armstrong. Your letter of February 24, with its boast of "research" and mailings to others who peacefully settled their actions with CSI long ago, demonstrates dramatically the need for the requested preliminary injunction to issue forthwith.

In 1986, your client, represented by counsel, entered into a detailed, written and explicit settlement agreement. He initialed each page of the agreement, and signed the final page, as did his lawyer. If your comments are to be taken as true that Mr. Armstrong, at the time that he signed the agreement with CSI, in fact believed that the agreement was "not worth the paper that [it was] printed on," then he obviously and in fact perpetrated a serious fraud on CSI in an attempt to induce CSI to pay him money in exchange for a settlement which he had no intention of honoring. You can rest assured that this fraud will be properly dealt with by CSI and the courts, along with any additional violations of the terms of the settlement agreement either by Mr. Armstrong or by you as his agent.

If it is your claim that Mr. Flynn fraudulently induced your client into both signing a settlement agreement under false pretenses and defrauding CSI into paying him settlement funds, then that is a claim which Mr. Armstrong must make, if at all, against Mr. Flynn. Such an allegation does not negate Mr. Armstrong's contractual responsibilities vis a vis CSI, nor does it excuse Mr. Armstrong's breaches, particularly given the specific nature of the representations made by Mr. Armstrong on videotape at the time that he signed the contract.

I would also note in response to your letters that CSI does indeed rely on Wakefield v. Church of Scientology for the reported precedent which it sets. I must admit, however, that I find your interest in diverting the court's attention to the facts of that case puzzling indeed. As Ms. Wakefield's former counsel, you no doubt recall that, after the first day of the in camera proceedings, you appeared in court without your client, and announced that she had checked into a hospital because she was feeling suicidal. Your request for adjournment at that time was naturally granted. Later, however, your client appeared before the court and sought to have you removed as her counsel, claiming, in a sworn affidavit, that you had failed to prepare any witnesses to appear at the hearings on Ms. Wakefield's behalf; attempted to incarcerate her in a mental hospital against her will; engaged her in long, personal phone calls very late at night or early in the morning; attempted to have a sexual relationship with her; and generally acted "without competence" in your handling of her case. I understand that when you were informed of the affidavit and its contents, you asked leave to withdraw from the case, and leave was promptly granted by the court. If you feel that these facts are somehow relevant to Mr. Armstrong's defense, you are welcome to raise them with the court.

Finally, it is apparent from your letters that Mr. Armstrong has acknowledged that he signed the agreement, considers it binding, and has willfully breached its terms. In light of this, we request that Mr. Armstrong agree to the entry of the preliminary injunction as requested for the pendency of this matter. Please inform me no later than March 3, 1992, whether Mr. Armstrong will stipulate to the entry of the preliminary injunction.

Very truly yours,

BOWLES & MOXON

Laurie J Bartilson Hs

Laurie J. Bartilson

LJB:mfh
cc: Andrew Wilson